Item Barcode: **50156504**

Attachment #1

AIR PERMIT

FOLDER LEVEL

AIR PA #: DB0378S 007711A

File Type: PERMITS

Volume: 001

Inclusive Dates: ~~1/1/2003~~ 1/1/2000 - 12/31/2004

Media Code/ Form

- ☐ Microfiche
- ☒ Roll Microfilm
- ☒ Electronic Image

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Box Barcode:

GAF MATERIALS CORPORATION
1361 Alps Road Wayne NJ 07470-3689 • Tel: 973-628-3000

DB 03785/007111A/P

June 13, 2003

Mr. Earl Jones
Senior Permit Engineer
Mechanical and Combustion Section
Air Permits Division
Texas Commission on Environmental Quality
P.O. Box 13087
Austin, Texas 78711-3087

Re: GAF Materials Corporation
Dallas, Texas

Subject: Air Permit Renewal Application and VERP Permit Application
Combine Permit Applications into a Single Permit

Dear Mr. Jones:

This letter is submitted to confirm our discussions in which GAF agreed that the current air permit renewal application and the VERP permit application can be combined into a single permit for the permitted facility.

Based on our discussions, it is our understanding that combining these permit applications into a single permit will not subject the permit or applications to further public notices or public hearings before the final permit can be issued.

Should there be a misunderstanding about this situation, please call John Stromme, Plant Manager, at (214) 637-8942 or myself at (973) 628-3507.

Sincerely,

Fred Bright

Fred Bright
Manager of Environmental Engineering

cc: Mr. Odis Lacey, GAF Materials Corporation – Dallas
Mr. John Stromme, GAF Materials Corporation - Dallas

Earl Jones - Dallas: Air Permit Emission Values - Cooling Section Retest

From: "Bright, Fred" <FBright@gaf.com>
To: "Earl Jones (E-mail)" <ejones@tnrcc.state.tx.us>
Date: 3/25/03 8:31 AM
Subject: Dallas: Air Permit Emission Values - Cooling Section Retest
CC: "Lacey, Odis" <OLacey@gaf.com>, "McIntosh, Ben" <BMcIntosh@gaf.com>, "Fagnant, Bill" <BFagnant@gaf.com>

Earl,
As you may recall, I previously explained that the Dallas Plant was the first GAF plant at which stack sampling of the cooling section stacks has been performed and we had no idea what results to expect. Based on discussions with a contact from another roofing company in the industry (who has done some cooling section sampling) I had some idea of what emission rates we should see.

After performing the stack test, the emissions were far higher than expected and did not seem reasonable based on known emission rates from other emission sources in the plant. Therefore we requested a third party to review the stack test report: Mr. James Steiner of TRC Environmental. Mr. Steiner has done stack testing for GAF at other locations, especially California. He has extensive experience and knowledge in stack testing, and through work with GAF, understands the issues associated with sampling a stack that includes asphalt fumes.

Based on his review of the cooling section stack test, we believe there exists significant potential for excessive error in the results. We believe that the stack testing should be redone and have initiated effort toward this objective. We have asked Mr. Steiner to revise the stack test protocol to address the concerns that were identified from his review of the previous stack test results and procedures.

Also, based on the comments made by Mr. Steiner and observations of plant personnel during the original test, it is believed that the sampling should be performed with all three stacks being sampled simultaneously, rather than sequentially. Therefore, management has agreed to incur the additional cost necessary to have three separate sampling crews onsite sampling all three stacks simultaneously.

I am presently awaiting input on a schedule for completion of a revised stack test protocol and a stack test schedule. I will forward this information as soon as it is received.

Fred

From: Gary Goldman
To: Jones, Earl
Date: 3/26/03 7:08AM
Subject: Re: Fwd: Dallas: Air Permit Emission Values - Cooling Section Retest

Yes, we attended this stack test. No unusual situations and or deviations from the methods were encountered. I would be curious to see the review conducted by TRC and what the specific issues/biases were with the sampling/analytical data. Have you received a copy of the test report? The region has not received a copy of this test report.

>>> Earl Jones 03/25/03 08:37AM >>>
Gary, did you monitor this stack test and can you provide any additional information?

Thanks Earl

Earl Jones - Dallas Plant - Air Permit Cooling Section Emission Values

From: "Bright, Fred" <FBright@gaf.com>
To: "Earl Jones (E-mail)" <ejones@tnrcc.state.tx.us>
Date: 2/20/03 7:14 AM
Subject: Dallas Plant - Air Permit Cooling Section Emission

Earl,
I apologize for the delay in getting back to you with the final information needed to complete the Dallas Plant permit: the emissions from the cooling section.

We've encountered a problem with preparation of these final values which I'll attempt to explain.

1) We've received the stack test report that provided emissions for both VOC and Particulate being emitted from the cooling section stacks for Line #3
2) Although the VOC values are higher than expected, they have not resulted in the same level of concern as the Particulate values.
3) The Particulate stack test results indicate 13.52 lb/hr of PM. (x 8,760 hr/yr ÷ 2,000 lb/ton) = 59.2 tons/yr PM as PTE
4) Prorating these values for smaller Line #1 yields approximately 49 tons/yr PTE
5) Total combined PM PTE for the cooling section ONLY from Line #1 and #3 equals 108 tons/year.
6) The facility becomes a Major Source for PM emissions.
7) The Particulate values are of concern and we believe them to be inaccurate.

This PM emission value of 13.52 lbs/hr is 5 to 6 times the UNCONTROLLED PM emission rate coming from the roofing shingle coater; as determined by stack testing performed by the roofing industry in conjunction with the EPA while evaluating plant emissions for the asphalt roofing MACT standard.

We are presently initiating efforts to have the stack test results reviewed by an independent 3rd party with experience in the roofing industry. We hope to complete this review by the end of February and determine whether the results are valid or if another stack test should be performed. I will keep you updated on the status of our efforts.

Fred

PM = 63.56
59.2
49.0
171.76 TPY

From: Earl Jones
To: "FBright@gaf.com".GWIA.GATEDOM
Date: 1/16/03 7:53AM
Subject: Dallas Air Permit Draft Review Questions revisited finally.

I've been a little busy but can now concentrate on GAF.

1. I believe I replied that I had discussed combining the two permits into a single permit with my management. The answer was that we should be able to combine the two permits without additional public notice and of course without public notice there is no opportunity for a hearing request.
You need to withdraw the VERP application for line 1 and add line 1 to to the permit amendment application for 7711A for the addition of the cooling emissions.
Frankly, I think this is the best because the 2 line are not easily separated for permit purposes.
I know you replied that you would have to present this option to your management and I hope you have done this.
I await your reply concerning this permit combination.

2. I would add the Torpedo style heaters to be on the safe side and this is the time to clean up everything.

3. Natural gas space heaters for personal comfort are covered under PBR and have never been included in any permits I have seen or written.

4. CFR 40 Part 60 Method 22 -Visual Determination of Fugitive Emissions from Material Sources and Smoke Emissions From Flares is specific and if you follow this method you will be correct.

5 Thanks for catching my error. This is the correction "7. An opacity or an odor nuisance condition, as confirmed by the TCEQ or any local air pollution control program with jurisdiction may be cause for additional controls. If the nuisance condition persists, subsequent stack sampling may also be required. "

6. Because of the lack of maintenance observed at the Dallas facility I feel copelled to provide you with some incentive to maintain all pollution control devices. Perhaps you canprovide us with some wording that is will do the same thing aand is enforceable.

I hope you have been able to complete the tsting of the cooling emissions. If so, would you please have a copy of the test report sent to me. Thanks

I have management asking me what is taking so long on these GAF permits. The answer is long and I am sure it is confusing to those not involved. The result is that we need to to try to complete this permitting in the near future. I appreciate GAF's and your cooperation and look forward to a speedy completion of this or these permits as you choose.

Thanks Earl

From: Earl Jones
To: "FBright@gaf.com".GWIA.GATEDOM
Date: 1/16/03 1:07PM
Subject: RE: Dallas Air Permit Draft Review Questions revisited finally.

Good. I will start trying to pull the two lines together into one permitwhile I am waiting on your information.

Earl Jones - RE: Dallas Air Permit Draft Review Questions revisited finally.

From: "Bright, Fred" <FBright@gaf.com>
To: Earl Jones <EJONES@tceq.state.tx.us>
Date: 1/16/03 9:31 AM
Subject: RE: Dallas Air Permit Draft Review Questions revisited

Earl,
Obviously your management is concerned about the time taken for the permit process at Dallas - as is mine.
I've discussed combining the two permits here and everyone agrees that it is the way to go, with qualifiers (of course):
1) this will not trigger a need for a public hearing (which you indicate it won't),
2) the VERP permit process allows older BACT requirements for older Line 1 than would apply to a Line 3 permit renewal. There were concerns that Line 1 would not meet BACT requirements. I explained that in my opinion the control methods used for Line 1 [dust collectors for particulate collection at point equivalent to Line 3 and both lines use a common ESP control device] are identical to the control methods used for Line 3 and therefore, if Line 3 meets BACT, then Line 1 should also. (Subject to TNRCC review and agreement.)
3) Most of the stillyard equipment was being permitted under the VERP. Again, concerns about BACT. I explained that basically storage tanks and burners in the stillyard are being addressed in the permitting. The burners simply exhaust products of fuel combustion and the tanks are being ducted to the stillyard thermal oxidizer. (By the way, the tank vent ducting project looks like it will end up costing $400,000 - $500,000.)

I will submit a formal letter to request that the two applications be combined. I was given approval last Friday, but due to other pressing issues, composing the letter keeps getting pushed back - hopefully this afternoon. I was told to include the two qualifiers: no hearing needed and acceptable BACT.

I assume you are aware that the stack test was performed on the cooling section stacks at the Dallas Plant just before the year-end shutdown. I've been bugging the plant to get me some results, but they are slow to respond. I'm not sure who's slow to respond, the plant or the stack test firm. I'm giving the Plant the benefit one this one since they are simply the middlemen, waiting to pass the info along. They do need to provide production rates during the test, but that's simple since production data is constantly documented (testing or not). [I'll make sure you get a copy of the test report.]

While waiting, I have completed an update of Table 1(a) combining Line 1 and line 3, but without the cooling section test results. A copy of this Table 1(a) is attached. I'll incorporate the cooling section results when they are received and email you a revised Table 1(a).

Fred

<<TNRCC Table 1(a) Line 3 and Line 1 01-2003.doc>>
-----Original Message-----
From: Earl Jones [mailto:EJONES@tceq.state.tx.us]
Sent: Thursday, January 16, 2003 8:53 AM
To: Bright, Fred
Subject: Dallas Air Permit Draft Review Questions revisited finally.

I've been a little busy but can now concentrate on GAF.

1. I believe I replied that I had discussed combining the two permits into a single permit with my management. The answer was that we should be able to combine the two permits without additional public notice and of course without public notice there is no opportunity for a hearing request.
You need to withdraw the VERP application for line 1 and add line 1 to the permit amendment application for 7711A for the addition of the cooling emissions.
Frankly, I think this is the best because the 2 line are not easily separated for permit purposes.

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5 Thanks for catching my error. This is the correction "7. An opacity or an odor nuisance condition, as confirmed by the TCEQ or any local air pollution control program with jurisdiction may be cause for additional controls. If the nuisance condition persists, subsequent stack sampling may also be required. "

6. Because of the lack of maintenance observed at the Dallas facility I feel compelled to provide you with some incentive to maintain all pollution control devices. Perhaps you can provide us with some wording that is will do the same thing and is enforceable.

I hope you have been able to complete the testing of the cooling emissions. If so, would you please have a copy of the test report sent to me. Thanks

I have management asking me what is taking so long on these GAF permits. The answer is long and I am sure it is confusing to those not involved. The result is that we need to try to complete this permitting in the near future. I appreciate GAF's and your cooperation and look forward to a speedy completion of this or these permits as you choose.

Thanks Earl

Earl Jones - FW: Dallas Plant Permit # 7711A

From: "Bright, Fred" <FBright@gaf.com>
To: <EJONES@tceq.state.tx.us>
Date: 12/4/2003 6:28 AM
Subject: FW: Dallas Plant Permit # 7711A

Earl,
I have reviewed the attached documents you forwarded.
I did not notice any errors or new revisions.
Thank you for all your effort and cooperation.
Fred

-----Original Message-----
From: Earl Jones [mailto:EJONES@tceq.state.tx.us]
Sent: Wednesday, November 26, 2003 9:25 AM
To: Bright, Fred
Subject: Dallas Plant Permit # 7711A

<<WordPerfect 6.1>> <<WordPerfect 6.1>> <<WordPerfect 6.1>> Fred, I propose to proceed with the attached permit and get it signed and mailed to you after Thanksgiving. Please review .
Have a happy thanksgiving. Earl

Environmental & Health Services
Air Pollution Control Section
320 East Jefferson Room LL13
Dallas, Texas 75203
Office: 214/948-4435 Fax: 214/948-4412

facsimile transmittal

To: Earl Jones Fax: 512-239-1300

From: Paul Blanton Date: 11/20/03

Re: Draft Permit Comments Pages: 3

CC:

☐ Urgent ☑ For Review ☐ Please Comment ☐ Please Reply ☐ Please Recycle

Notes:

CITY OF DALLAS

Request for Comments -- Draft Conditions
TCEQ -- Air Permits Division
Phone: (512)239-1250
Fax: (512)239-1300
Mailing Address: TCEQ, Air Permits, P.O. Box 13087, Austin, TX 78711-3087

TO: Region: 4 City: Dallas County: Dallas

Submitted by: Mr. Earl Jones E-Mail ID: ejones@tceq.state.tx.us Phone: (512) 239-1351

Date Request Submitted: 11/18/2003

Comments Deadline: 12/18/2003

Date Application Received by TCEQ in Austin: September 28, 2000

REGIONAL OFFICES: Please return comments ASAP, but no later than the comments deadline which is 21 days from the submittal date. Permit disposition will proceed after comments are received or after the comments deadline has past. Permit Reviewer may request faster response if needed.

LOCAL PROGRAMS: The company below has submitted an application for the project referenced below in accordance with regulations of the TCEQ. Please return comments ASAP, but no later than the comments deadline which is 21 days from the submittal date. Permit disposition will proceed after comments are received or after the comments deadline has past. Permit Reviewer may request faster response if needed. If no comments are received within this time frame, we will assume you have no comments or objections to the project as proposed. Please return a complete copy of the form (both sides) with your comments.

PROJECT TYPE: amendment & renewal

PROJECT NO.: 75805 REGULATED ENTITY NO.: RN100788959

PERMIT NO.: 7711A

COMPANY NAME: Gaf Materials Corporation CUSTOMER REFERENCE NO.: CN600474753

PLANT NAME: Gaf Materials Corporation

LOCATION: 2600 Singleton Blvd.

UNIT NAME: Asphalt & Roofing Materials Manufacturing Facili COUNTY: Dallas

TECHNICAL CONTACT: Roger L. Stephens PHONE: (214) 637-8919

OPERATING SCHEDULE: Continuous? ___

Hours/Day 24 Days/Week 7 Weeks/Year 52 Night Operation? ___

Engineer's Comments:

Attachments: MAERT, Draft Conditions

Request for Comments -- Draft Permit
RESPONSE

TO: Mr. Earl Jones, Austin

FROM: Region: 4 City: Dallas County: Dallas

Copy of Application Received by your Office: ___ YES ___ NO Date Received: _____

COMPANY NAME: Gulf Materials Corporation

PERMIT NO.: 7711A

REGULATED ENTITY NO: RN100788959 **PROJECT NO.: 75805**

Investigator's/Compliance Officer's Name (Please Print): Paul D. Blanton

Phone: 214-948-4194

Comments Deadline (from pg. 1): 12/18/2003

Date of Last Site Visit: 10/30/2003

COMMENTS ON CONDITIONS: (Please mark up draft special conditions with your comments. Please address applicability and enforceability. List any additional conditions below):

Compliance Determination Conditions: _____

Operational Limitations: _____

GENERAL COMMENTS: SPECIAL CONDITION # 14-D "... one copy to the TCEQ Houston Regional Office" needs to be changed to "... the TCEQ DFW Regional Office" SP # 17 refers to GC # 7 as to the appropriate paperwork required but I don't know what GC # 7 stated. Please spell out the paperwork required or delete SP # 17 (redundancy issue)

PERMIT ISSUANCE:

If you have any objections to issuance, please note them here:

Customer Detail

Number:	CN600474753
Name:	GAF MATERIALS CORP
Type of Customer:	CORPORATION
State Franchise Tax ID:	12232762901
DUNS Number:	
Customer Number of Employees:	0-20
Independently Owned and Operated:	
Classification:	AVERAGE
Rating:	1.5
Publication Date:	10/01/2003

Regulated Entity and Mailing Addresses

Regulated Entity		Role	Customer Mailing Address			
Name	Number		Delivery	City	State	Zip
GAF MATERIALS CORPORATION	RN100788959	OWNER	PO BOX 655607	DALLAS	TX	75265
GAF MATERIALS CORPORATION	RN101058121	OWNER	PO BOX 24040	HOUSTON	TX	77229

Electronic Communications

Regulated Entity		Customer Electronic Communication		
Name	Number	Phone	Fax	E-Mail
GAF MATERIALS CORPORATION	RN100788959	214-637-1060		

November 5, 2003

COMMENTS: Dallas DRAFT Air Permit 7711A of 10-27-03

A) Static copy CND 7711A (Special Conditions):

1) **Item 6. B.** – Please change to read as follows: "The emissions from blowing stills and ~~all tanks~~ **the following stillyard storage tanks**, containing asphalt, shall be vented to the Thermal Oxidizer: **T-8, T-9, T-10, T-14, T-15, T-110, and T-120**."

   As initially written, someone may interpret that all the tanks in the entire plant are to be vented to the Thermal Oxidizer. There are also two horizontal storage tanks in the stillyard (asphalt based adhesives) that are not vented to the oxidizer.

2) Item 9 – We would like to have the "90 days after issuance date of this permit," extended to 180 days. As you are aware, we are currently planning modifications to the sand applicator dust control system in order to reduce the fines that are exhausted via the cooling section exhaust. We do not expect this work to be completed within the 90-day period after issuance date of permit (assuming issued by December 30th). But, we believe that the work should be completed within a 180-day period. Extending this time would eliminate testing twice (at 90-days and again when project is complete). It will also allow scheduling of contractors for all the compliance stack tests at the same time.

B) Static copy of mrt 7711A (Allowable Emission Rates):

1) **Page 1, EPN 28** – Please simplify Source Name to Nat. Gas Asphalt Heater, or simply Asphalt Heater. The PM_{10} value has also been updated: I double-checked calculation and someone rounded differently than I would have.

2) **Page 2, EPN 23** – Please DELETE this item (Stand-By Thermal Oxidizer Vent). This unit is no longer available for service. The burner was removed in November 2002.

3) **Page 2, EPN 8** – Please revise the PM_{10} values for this Source. Based on recent stack testing and other facilities, we have determined that PM_{10} emissions from blowstill thermal oxidizers are much higher than PM values. Evaluations are still in progress to determine the cause of this situation.

4) **Page 2, EPN ??** – Please DELETE this item (Thermal Oxidizer/Waste Heat Boiler By-Pass Stack). This is a duplicate entry for EPN BLR5 shown on Page 1.

5) **Page 2, EPN 34** – Please revise the PM_{10} values. After checking double-checking emission values, have noted a small error in these values.

6) **Page 2, EPN 1-1** – Please note that there are two (2) entries for EPN 1-1 (one below the other). Please delete one of the two entries. Although the name is slightly different, they are the same equipment.

7) **Page 3, EPN 1-2** – Please DELETE this item (Line 1 Stabilizer Thermal Fluid Heater Vent). The number has been renumbered as EPN HTR1 and is entered below on Page 3.

8) **Page 3, EPN COOL1** – Please revise the Source Name to "Line No. 1 Cooling Section" Also, please revise the PM_{10} values for this emission source. The emission values have been revised to reflect a reduction in PM_{10} expected when the current sand applicator dust control enhancement project has been completed.

9) **Page 3, EPN FUG3** – Please DELETE this Source. Plant wide fugitive emissions have been combined into a single Source entry: FUG1 (Page 4).

10) **Page 3, EPN 25** – Please revise the PM_{10} emission values for this item. The emission values were recalculated based on BACT for dust collectors (0.01 grains/scf).

COMMENTS: Dallas DRAFT Air Permit 7711A

11) **Page 4, EPN 30** – Please add the word "Hot" to the name of this Source (Hot Oil Heater Vent). And please revise the VOC emission values: numbers checked and rounded differently.

12) **Page 4, EPN FUG1** – Please revise this Source Name to "Plant-wide Fugitive Emissions". The emission values have also been revised. When initially calculated, this source included fugitive emissions that are now included with the emissions for the cooling section exhaust (COOL1 & COOL2).

13) **Page 4, EPN COOL3** - Please revise the PM_{10} values for this emission source. The emission values have been revised to reflect a reduction in PM_{10} expected when the current sand applicator dust control enhancement project has been completed.

14) **Page 4, EPN HTR6** – Please revise emission values. Based on information available, this unit has a 6.0 mmbtu/hr burner. The emission values have been revised for this burner size.

15) **Page 5, "Maximum allowable Asphalt Throughput Rate"** - Please revise values for Line 1 and Line 3 to the following:

    Line 1 at **24,886** lbs/hour
    Line 3 at **41,472** lbs/hour

    NOTE: these values are higher than in the draft permit. The emission rates for EPN 34 were calculated on an lb/hr of operation (at 8,760 hrs/yr) and should satisfy these higher rates. Also, they are based on production rates not yet achieved by the plant, but efforts are currently in progress to make them reality. They may not be achieved by the time stack testing is performed, but Item 13 of the Special Condition addresses this situation.

16) **Page 5, "Maximum allowable Production Rate (Line 1 plus Line 3)"** - Please revise these values to read:

    171 tons/hour of finished shingles
    (**NOTE:** this value is based on both production Lines operating at the maximum rates used to calculate the above "Asphalt Throughput" values.)

    1,498,000 tons/year of finished shingles
    (**NOTE:** this revised tons/year value is simply calculated by multiplying the above hourly rate times 8,760 hours per year.)

Earl—

Roll VERP stuff into existing amendment then renew. After permit is issued then we can void out VERP. Hang on to VERP until we are sure no problems pop-up that would or could be handled better under a VERP. Let me know if this approach is a problem.

Thanks

Mike

6/16/03

RICHARD/JAMES—

Company has 3 permit actions open: VERP, RENEWAL, AMEND. THEY WANT TO CONSOLIDATE ALL THREE. I recommend they withdraw their VERP request and use the existing amend. to pickup those sources. Then renew the entire amended permit. They have been to public notice for the amend, VERP's RENEWAL. I don't think they will require further notice. Let me know if you agree/disagree? THANKS

MDG

GAF MATERIALS CORPORATION
1361 Alps Road Wayne NJ 07470-3689 • Tel: 973-628-3000

June 13, 2003

Mr. Earl Jones
Senior Permit Engineer
Mechanical and Combustion Section
Air Permits Division
Texas Commission on Environmental Quality
P.O. Box 13087
Austin, Texas 78711-3087

Re: GAF Materials Corporation
Dallas, Texas

Subject: Air Permit Renewal Application and VERP Permit Application
Combine Permit Applications into a Single Permit

Dear Mr. Jones:

This letter is submitted to confirm our discussions in which GAF agreed that the current air permit renewal application and the VERP permit application can be combined into a single permit for the permitted facility.

Based on our discussions, it is our understanding that combining these permit applications into a single permit will not subject the permit or applications to further public notices or public hearings before the final permit can be issued.

Should there be a misunderstanding about this situation, please call John Stromme, Plant Manager, at (214) 637-8942 or myself at (973) 628-3507.

Sincerely,

Fred Bright

Fred Bright
Manager of Environmental Engineering

cc: Mr. Odis Lacey, GAF Materials Corporation – Dallas
Mr. John Stromme, GAF Materials Corporation - Dallas

06/16/2003 ---------- NSR PERMITS IMS- PROJECT RECORD ----------

PROJECT#: 83987	PERMIT#: **7711A**	STATUS: **P**	DISP CODE: _____
RECEIVED: **07/31/2001**	PROJTYPE: **RAMD**	RENEWAL: **12/04/2000**	ISSUED DATE: _____
FEE DATE: 07/31/2001	FEE AMT: $ 450	STDX1/SP: 0	SUP-DISP DATE:

GROUP: PAR

PARSTAFF2: NELON,

GROUP: M/A

TECHENGR : JONES, EARL

ADMIN REVIEW

A - PAR TRANSFER TO APD :	09/27/2001	A - PAR RECEIVED :	09/27/2001	A - PN DRAFT SENT TO COMPANY :	05/25/2002
A - ADMINCOMP :	06/07/2002	A - PAR TRANSFER TO APD :	06/07/2002	A - PN DRAFT APPROVED :	06/07/2002
A - 1ST PUBLIC NOTICE :	06/07/2002				

ISSUED TO: GAF MATERIALS

CUSTOMER REGISTRY ID: **CN600474753**

PRIMARY CONTACT

CONTACT TYPE: RESPONSIBLE OFFICIAL

NAME: MR ROGER STEVENS — TITLE: PLANT MANAGER

PHONE: 214-637-8919 ext — FAX: 214-637-5202 ext

STREET: PO BOX 655607 — CITY/STATE,ZIP: DALLAS, TX , 75265-

PROJECT INFORMATION

UNIT: ASPHALT ROOFING MATERIALS MANUFACTURING

SIC: 2952 REGION: 4 ACCOUNT: **DB0378S** REG ENTITY ID: **RN100788959**

SITE NAME: GAF MATERIALS

COUNTY: DALLAS CAPUNITS: UNITTYPE: MXASR

CAPACITY: CITY: DALLAS

LOCATION: 2600 SINGLETON BLVD

PUBLIC NOTICE

PUBLIC NOTICE REQUIRED?: Y PN1 ALT LANGUAGE: YES PN2 ALT LANGUAGE: NO

EMISSION RATES

TONS/YR	NOX	CO	VOC	PM	SO2	OTHER	TOTAL

PROJECT NOTES

NOTES

ADMINISTRATIVE: DISCUSSIONS BETWEEN E. JONES AND APPLICANT ABOUT STACK TESTING MIGHT REMOVE REQUIREMENT FOR PN. APPLICANT HAS DRAFT OF PN AND IS WAITING FOR CONFIRMATION OF STACK TEST FEASABILITY/RESULTS

ADMINISTRATIVE: PN CONTACT ON LEAVE UNTIL JUNE 10TH.

06/16/2003 ---------- NSR PERMITS IMS- PROJECT RECORD ----------

PROJECT#: 82846	PERMIT#: **48785**	STATUS: **P**	DISP CODE: _____
RECEIVED: **04/23/2001**	PROJTYPE: **CRVW**	RENEWAL:	ISSUED DATE: _____
FEE DATE: 04/25/2001	FEE AMT: $ 450	STDX1/SP: 0	SUP-DISP DATE:

GROUP: PAR

PARSTAFF1: ROMERO, RONICA

PARSTAFF2: MARTIN,

GROUP: M/A

TECHENGR : JONES, EARL

ADMIN REVIEW

A - PAR RECEIVED :	08/20/2001	A - SITE REVIEW RFC :	02/14/2002	A - ACCT#/CR# REQ FROM REGION :	05/30/2002
A - ADMIN DEF CYCLE :	05/30/2002				
A - TELECONS :	06/07/2002	A - PN DRAFT SENT TO COMPANY :	06/15/2002		
A - LP DALLAS :	06/17/2002	A - TELECONS :	06/21/2002	A - TELECONS :	06/24/2002
A - ADMINCOMP :	06/25/2002	A - PAR TRANSFER TO APD :	06/25/2002	A - PN DRAFT APPROVED :	06/25/2002
A - 1ST PUBLIC NOTICE :	06/25/2002				

ISSUED TO: GAF MATERIALS

CUSTOMER REGISTRY ID: **CN600474753**

PRIMARY CONTACT

CONTACT TYPE: RESPONSIBLE OFFICIAL

NAME: MR ROGER STEPHENS TITLE: PLANT MANAGER

PHONE: 214-637-8919 ext FAX: 214-637-5202 ext

STREET: PO BOX 655607 CITY/STATE,ZIP: DALLAS, TX , 75265-

PROJECT INFORMATION

UNIT: ASPHALT ROOFING LINE

SIC: 2952 REGION: 4 ACCOUNT: **DB0378S** REG ENTITY ID: **RN100788959**

SITE NAME: GAF MATERIALS

COUNTY: DALLAS CAPUNITS: UNITTYPE:

CAPACITY: CITY: DALLAS

LOCATION: 2600 SINGLETON BLVD

PUBLIC NOTICE

PUBLIC NOTICE REQUIRED?: Y PN1 ALT LANGUAGE: YES PN2 ALT LANGUAGE: NO

EMISSION RATES

VERP :YES

TONS/YR	NOX	CO	VOC	PM	SO2	OTHER	TOTAL

06/16/2003 ---------- NSR PERMITS IMS- PROJECT RECORD ----------

PROJECT#: 75805	PERMIT#: **7711A**	STATUS: **P**	DISP CODE: _____
RECEIVED: **09/28/2000**	PROJTYPE: **RNEW**	RENEWAL:	ISSUED DATE: _____
FEE DATE: 09/26/2000	FEE AMT: $ 2028	STDX1/SP: 0	SUP-DISP DATE:

PARSTAFF1: BLACK, RAMONA

GROUP: M/A

TECHENGR : JONES, EARL

ADMIN REVIEW

A - PAR RECEIVED :	09/28/2000 A - SITE REVIEW RFC :	10/10/2000 :CH :	10/10/2000
:SR :	10/10/2000 :PN :	10/16/2000 PN - APPROVED :	10/17/2000
A - PAR TRANSFER TO APD :	10/17/2000 C:-PN :	10/17/2000 C:T-DEF :	10/24/2000
E:-PN? :	11/21/2000 E:*-PN :	12/04/2000 C:T-DEF :	12/14/2000
E:T-DEF? :	01/21/2001 C:T-DEF :	02/27/2001 E:T-DEF? :	04/20/2001
E:T-DEF? :	05/04/2001 E:T-DEF? :	06/04/2001 :*CH :	01/11/2005

ISSUED TO: GAF MATERIALS

CUSTOMER REGISTRY ID: **CN600474753**

PRIMARY CONTACT

CONTACT TYPE: RESPONSIBLE OFFICIAL

NAME: MR CESAR HAGE	TITLE: PLANT MANAGER
PHONE: 214-637-8919 ext	FAX: 214-637-5202 ext
STREET: PO BOX 655607	CITY/STATE,ZIP: DALLAS, TX , 75265-

PROJECT INFORMATION

UNIT: ASPHALT & ROOFING MATERIALS MANUFACTURING

SIC: 2952 REGION: 4 ACCOUNT: **DB0378S** REG ENTITY ID: **RN100788959**

SITE NAME: GAF MATERIALS

COUNTY: DALLAS CAPUNITS: UNITTYPE:

CAPACITY: CITY: DALLAS

LOCATION: 2600 SINGLETON BLVD.

PUBLIC NOTICE

PUBLIC NOTICE REQUIRED?: Y PN1 ALT LANGUAGE: NO PN2 ALT LANGUAGE: NO

	PUB	PUB HEARING	MAILING	COMMENTS
NUMBER OF	0	1	1	1

PN - PUBLISH :	11/09/2000 PN - END OF PERIOD :	12/11/2000 PN - END OF PERIOD :	12/11/2000
PN - HEARING REQUEST :	11/17/2001		

EMISSION RATES

TONS/YR	NOX	CO	VOC	PM	SO2	OTHER	TOTAL

From: Gary Goldman
To: Jones, Earl
Date: 6/10/03 2:14PM
Subject: Fwd: RE: GAF Materials, Dallas, Texas, Permit 7711A

Earl,
I have read the response form Mr. Jim Steiner, Project Manager for TRC on behalf of GAF.

Mr. Steiner states that the condensate in the SCAQMD 25.3 sampling train is the same as the back half in the method 5A sampling train and that since the organic content (contained in the condensate) in the SCAQMD 25.3 sampling train is being counted as particulate matter (PM) in the method 5A sampling train, it is being counted twice and should not be counted as VOC in the SCAQMD 25.3 train. He claims this is double counting and should not be allowed.

I have conferred with Bob Mann, Compliance Support Division (formerly Engineering Services), and we have determined that this argument, although understood, is not appropriate.

The determination of PM and VOC may include part of the same mass used in both sets of analysis. In other words the definitions of VOC and PM may overlap in some instances, but they are nonetheless analyzed independently from each other. Two independent sampling trains were used at this test event, one for PM (5A) and the other for VOC (25.3). This was proposed and accepted at a pre-test meeting held on October 18, 2002.

The PM condensibles are determined gravimetrically after the removal of uncombined water. SCAQMD 25.3 method states that the VOC is determined by combining the results from the independent analyses of the condensate and the canister. However, that does not mean that the condensate should not be counted as VOC because it was counted as a particulate in a different sampling train.

There are other issues in Mr. Steiner's response as far as the PM testing is concerned in that the back half recovery of the PM sampling train should have been recovered with TCE as the front half was and as a result the PM value may be biased low. I did observe the recovery of the sampling train and did not note any residue or film in the impingers after rinsing, although this could be possible.

FYI, I have not seen the GAF sampling report that Mr. Steiner reviewed.

>>> Earl Jones 06/09/03 11:08AM >>>
Gary, When you find the time, please review this and give me your opinion.

Thanks Earl

CC: Mann, Robert M.

Permit Renewal & Amendment
Source Analysis & Technical Review

Company:	Gaf Materials Corporation	Permit No.:	7711A
City:	Dallas	Project No.:	75805 & 83987
County:	Dallas	Account No.:	DB-0378-S
Project Type:	RNEW	Regulated Entity No.:	RN100788959
Project Reviewer:	Mr. Earl Jones	Customer Reference No.:	CN600474753
Facility Name:	Asphalt & Roofing Materials Manufacturing Facility		

Authorization Checklist

Will a new policy/precedent be established? (ED signature required if yes) ..... No
Is a state or local official opposed to the permit?(ED signature required if yes) ..... No
If yes, please provide name and title of official:
Is waste or tire derived fuel involved? (ED signature required if yes) ..... No
Are waste management facilities involved?(ED signature required if yes) ..... No
Will action on this application be posted on the Executive Director's agenda? ..... Yes
Have any changes to the application or subsequent proposals been required to increase protection of public health and the environment during the review? ..... No
(If yes, please identify any permit conditions or permit limits in the Project Overview.)

Project Overview

The company applied for a permit renewal of Permit No 7711A which is a permit for their Line 3 roof shingle manufacturing. There was interest in this facility from the Toxicology Staff because of odors detected while they were in the area. A visit to the plant revealed emissions from the cooling portion of the Line 3 that were not represented in the existing permit. An application for an amendment was received 07/31/2001 with public notice on 07/04/2002. A VERP Application was received on 04/23/2001 for Line 1. Since Line 1 and Line 3 are not separate in the asphalt receiving and processing and are both controlled by the same electrostatic precipitator the company elected to withdraw the VERP and include Line 1 as an amendment to #7711A. The emissions in tons/year are as follows: $PM_{10} = 98.21$, $NO_X = 33.01$, $SO_2 = 3.39$, $CO = 26.83$, $VOC = 43.77$. Preliminary TCEQ modeling indicated off-property PM impacts of 900 mg/m^3. Dispersion modeling and corrections to the Table 1(a) were requested from the company.

Compliance History

In compliance with 30 TAC Chapter 60, a compliance history report was prepared on: 01/02/2004
The compliance period was from 09/31/98 to 10/01/2003
Was the application received after September 1, 2002? ..... No
If yes, what was the site rating? Company rating? 1.5
Provide the GroupWise document numbers and a brief description of compliance history from each database:
Is the permit recommended to be denied or has the permit changed on the basis of compliance history or rating? ..... No

Public Notice Information

§ 39.403 Public notification required? ..... Yes
If no, give reason:
A. Date application received: 09/28/2000 Date Administrative Complete: 10/17/2000
B. Small Business source? ..... No
§ 39.418 C. Date 1st Public Notice /Admin Complete/Legislators letters mailed: 10/28/2000
§ 39.603 D. Pollutants: PM,.NO_X, SO_2, CO, & VOC
E. Date Published: 11/09/2000 in Dallas Morning News
Amendment Notice Published 07/04/2002 in Dallas Morning News
Date Affidavits/Copies received: 11/20/2000 & 07/22/2002
F. Bilingual notice required? ..... Yes
Language: Spanish
Date Published: 11/09/2000 & 07/04/2002 in El Extra
Date Affidavits/Copies received: 11/20/2000 & 07/22/2002

Renewal/Amendment Technical Review

Permit No. **7711A** Regulated Entity No. **RN100788959**

§ 39.604 G. Certification of Sign Posting / Application availability ..... 12/01/2000 & 08/10/2002

H. Public Comments Received? 2
Meeting requested? NO ..... Meeting held?
Hearing requested? YES ..... Hearing held?
Was/were the request(s) withdrawn? Yes Date: 10/11/2002
Replies to Comments sent to OCC: .....
Consideration of Comments:

§ 39.419 2nd Public Notification required? ..... No
If no, give reason: If the project does not increase allowances or the compliance history is not bad, then no further comments, meetings, or notices may occur. Discuss with your attorney.

A. Date 2nd Public Notice mailed: .....
B. Preliminary determination .....

§ 39.603 C. Pollutants:
D. Date Published: in
Date Affidavits/Copies received:
E. Bilingual notice required? .....
Language:
Date Published: in
Date Affidavits/Copies received:
F. Public Comments Received?
Meeting requested? ..... Meeting held?
Hearing requested? ..... Hearing held?
Was/were the request(s) withdrawn? Date:

§ 39.420 G. Consideration of Comments:
RTC, Technical Review & Draft Permit Conditions sent to OCC: .....
Request for Reconsideration Received?
H. Final action: Issue Letters enclosed? ..... yes

30 TAC Chapter 116 Rules

§ 116.315(b) Date of expiration of permit? 12/04/2000
§ 116.310 Date written notice of review was mailed .....
§ 116.310 Date application for Renewal (PI-1R) received? 09/28/2000
§ 116.311(a)(2) Is the facility being operated in accordance with all requirements and representations specified in the current permit and do the emissions from the facility comply with all TCEQ air quality rules and regulations, and with the intent of the Texas Clean Air Act ? ..... Yes
If no, explain:
§ 116.311(a)(3) Compliance with applicable NSPS? ..... Yes
Subparts A & UU
§ 116.311(a)(4) Compliance with applicable NESHAPS? ..... N/A
Subparts &
§ 116.311(a)(5) Compliance with applicable NESHAPS(MACT) for source categories? ..... N/A
Subparts &
§ 116.311(a)(6) Compliance with applicable hazardous air pollutant requirements in §116.180 - 116.183? ..... N/A
112(g) Review? .....
§ 116.311(b)(1) Is additional information regarding emissions from the facility and their impacts on the surrounding area required? .. No
§ 116.311(b)(2) Does the facility use appropriate control technology, considering costs, age and impact of emissions? ..... Yes

§ 116.314(a) The facility meets all permit renewal requirements? ..... Yes
§ 116.313 Permit Renewal Fee: $ 2028 Paid? ..... Yes

Renewal/Amendment Technical Review

Permit No. **7711A** Regulated Entity No. **RN100788959**

30 TAC Chapter 113 Rules

§ 113.100 Compliance with applicable MACT standards expected? ..... N/A
Subparts &

30 TAC Chapter 116 Rules - Amendment Requirements

Public Notice Information

§ 116.130 - 137 Was public notification for the amendment required? ..... Yes
If no, give reason:
If yes, was notification period for 30-days? Yes
A. Date application received: 07/31/2001 Date application complete: 06/07/2002
B. Preliminary determination ..... Issue
C. Public notice mailed: 06/07/2002
D. Final action: Issue Letters enclosed? ..... Yes

Emission Controls

§ 116.111(2)(C) Will the facility utilize BACT? ..... Yes
§ 116.111(2)(G) Is the facility expected to perform as represented in the application? ..... Yes
§ 116.140 Permit Fee: $ 450 Fee certification provided? ..... N/A

Sampling And Testing

§ 116.111(2)(A)(i) Are the emissions expected to comply with all TCEQ air quality Rules & Regs, and the intent of the Texas Clean Air Act? ..... Yes
§ 116.111(2)(B) Will emissions be measured? ..... Yes
Method: Opacity & Visibility
Comments:

Federal Program Applicability

§ 116.111(2)(D) Compliance with applicable NSPS expected? ..... Yes
Subparts A & UU
§ 116.111(2)(F) Compliance with applicable NESHAPS expected? ..... N/A
Subparts &
§ 116.111(2)(H) Is nonattainment review required? ..... No
A. Is the site located in a nonattainment area? ..... No
B. Is the site a federal major source for a nonattainment pollutant? ..... No
C. Is the project a federal major source for a nonattainment pollutant by itself? ..... No
D. Is the project a federal major modification for a nonattainment pollutant? ..... No
1. Did the project emission increases for nonattainment pollutant minus the two-year average actual emissions trigger netting? .....
If yes, attach Table 1N & 9N. If no, explain:
2. Is the contemporaneous increase significant? ..... If yes, nonattainment review is required.
§ 116.111(2)(I) Is PSD applicable? ..... No
A. Is the site a federal major source (100/250 tons/yr)? ..... No
B. Is the project a federal major source by itself? ..... No
C. Is the project a federal major modification? ..... No
1. Did project emission increases, without decreases, for pollutant of concern, minus the two-year average actual emissions trigger netting? .....
2. Was contemporaneous increase significant? .....
3. Change excluded by 40 CFR 52.21(b)(2)(iii)? .....
If yes to B.2 or B.3 above, explain:

Mass Cap and Trade Applicability

§ 116.111(a)(2)(L) Is Mass Cap and Trade applicable? ..... No

Renewal/Amendment Technical Review

Permit No. **7711A** Regulated Entity No. **RN100788959**

Did the proposed facility, group of facilities, or account obtain allowances to operate? ..... N/A

Title V Applicability

§ 122.10(8)(A)	Is facility a major source under FCAA Section 112(b)?	No
	A. Facility emits 10 tons or more of any single HAP?	No
	B. Facility emits 25 tons or more of a combination	No
§ 122.10(8)(C)	Does the facility emit 100 tons or more of any air	No
§ 122.10(8)(D)	Is the facility a non-attainment major source?	No

Note: Fugitive emissions are not included in total emissions unless the facility is named in 30 TAC 122.10(8)(C).

Request for Comments

Region:	4	Reviewed By:	
City:	**Dallas**	Reviewed By:	**Barbara Trahan**
County:		Reviewed By:	
TARA:		Reviewed By:	
Comp:		Reviewed By:	**Earl Jones**
Legal:		Reviewed By:	

Process Description

GAF is a nationwide manufacturer of building materials products. The GAF Dallas Facility manufactures asphalt shingles for the roofing industry.

Asphalt roofing shingles manufacture start with a dry non-woven fiberglass mat being fed (unrolled) into the roofing shingle production line. A mechanical splicer and an accumulator are provided so a new roll can be spliced onto the end of the depleted roll without interruption of production. The fiberglass mat strand (approximately 60 inches wide) is pulled through a dip hot asphalt (powdered limestone stabilized) coater which coats both sides of the mat. Immediately after the coater ceramic granules are sprinkled onto the mat surface. As the mat goes through a reverse roller the granules are embedded into the asphalt coat and sand is sprinkled on the backside of the mat. This sand covers the asphalt and prevents sticking during the rest of the process and in the packaged shingles. The hot coated strand proceeds through cooling rolls (water cooled drums) where water is also sprayed onto the hot strand. The steam and mist vent upwards through three exhaust fans in the roof. It is then accumulated in festoons in the looper section to provide surge capacity required prior to cutting. Self-seal striping is applied in stripes and the strand is cut into shingle size and automatically packaged.

There are six major production support operations: (1) asphalt railcar unloading and storage, (2) asphalt blowing, (3) back surfacing (sand) and granule unloading and storage, (4) stabilizer unloading and storage, (5) stabilizer heating, and (6) stabilizer/asphalt mixing.

Pollution Prevention, Sources, Controls and BACT

Impacts Evaluation

1. Was modeling done? Type?
2. Will GLC of any air contaminant cause violation of NAAQS? .....
3. Is this a sensitive location with respect to nuisance? .....
4. Is the site within 3000 feet of any school? .....
5. Toxics Evaluation:

Miscellaneous

Is applicant in agreement with special conditions? ..... Yes
Company representative(s)? ..... Fred Brite
Contacted via? ..... e-mail
Date of contact? 12/04/2003
Other permit(s) affected by this action?
If YES, list permit number(s) and actions required or taken

Renewal/Amendment Technical Review

Permit No. **7711A** Regulated Entity No. **RN100788959**

Project Reviewer	Date	Team Leader/Section Manager/Backup	Date

Joshua Reddoch - RE: Dallas - GAF Plant Air Permit 7711A; Renewal

From: "Bright, Fred" <FBright@gaf.com>
To: "Joshua Reddoch" <JReddoch@tceq.state.tx.us>
Date: 9/27/2004 11:16 AM
Subject: RE: Dallas - GAF Plant Air Permit 7711A; Renewal

Josh,
Sorry for the delay getting back to you on this.

Two(2) items:
A. Attached is a copy of an "Abbreviated Title V Application" that was submitted back on September 15th. I was not sure that this gets routed to you, so I thought I would forward you this copy.
B. We have met with a stack test company (METCO Environmental) at the plant site and have received a proposal with two options for performing stack testing of 9-stacks. The two options were (1) all permit compliance pollutants ($54,100.00) and (2) PM only ($32,600.00), since PM is our current Title V issue of concern.

I've been discussing these two options with the Dallas Plant and have a couple of questions for your input:

1) The permit includes two Cooling Section emission sources: "COOL 1" (for production line 1) and "COOL 3" (for production line 3). Each production line makes the same product (roofing shingles) and each production line cooling section has 3-stacks that vent water vapor and air used to cool the product. When we did the previous cooling section stack testing for PM and VOC, Earl Jones allowed us to sample the 3-stacks from one production line, calculate the emissions on a "lb of pollutant/ ton of finished product" basis and use these factors to calculate pollutant emission rates for the other production line.

In order to save some stack testing costs, would it be acceptable to use this approach for the current planned stack testing and would this approach also be acceptable for the required compliance testing? [This would reduce the number of stacks from 9-stacks to 6-stacks. Also, the cooling section stacks must be sampled simultaneously, requiring 3-stack test crews.]

2) Based on your comment in item #2 below, we are reluctant to commit to stack testing for all permit stated testing requirements because we may be required to test again after the formal permit is issued. However, due to the expense of doing the testing, we would certainly prefer to do the compliance stack testing with this current proposed round of stack sampling if we can get an agreement that this testing would be accepted as the permit compliance sampling.

Would it be possible to arrange your suggested discussion with the Dallas Regional Office.

Note: we anticipate contracting with METCO ASAP so they can prepare and submit the testing protocol and schedule the stack testing accordingly.

Fred Bright
973-628-3507

<<Dallas Temp Title V Submittal.pdf>>

-----Original Message-----
From: Joshua Reddoch [mailto:JReddoch@tceq.state.tx.us]
Sent: Thursday, July 15, 2004 4:36 PM
To: Bright, Fred
Subject: Re: Dallas - GAF Plant Air Permit 7711A; Renewal

Fred,
Thanks for your response. The main issue we have is that we cannot issue a permit that is identified as a major source without a submitted Title V permit application. As I see it there are two options:

1) GAF submits a Title V application and we issue the permit as a major source. Once the compliance stack tests demonstrate the facility is not a major source, GAF can alter permit 7711A to lower the emission rates for those points on the MAERT and withdraw the Title V application.

2) GAF performs stack testing before 7711A is issued to establish the emission rates for those points. We can re-draft a MAERT based on the stack testing data, which could possibly avoid Title V designation. The initial determination of compliance outlined in Special Conditon 9 may still be required, but that will be a decision for the Dallas Regional Office. We can certainly have a discussion with them if you choose to go this route.

If you or Trinty have any other suggestions, I'd be glad to hear them, but these are the only two options I think are available.

Look forward to hearing from you.

Thanks again.

Josh Reddoch
TCEQ Air Permits Division
512/239-6115

>>> "Bright, Fred" <FBright@gaf.com> 07/15/04 02:50PM >>>
Josh,
I have completed my review of the issue you raised: the Plant is now a Major Source for PM/PM10 emissions and therefore will require a Title V permit. Based on my review, your assessment is correct.

We had been closely watching this issue as the permitting work progressed. Attached is a spreadsheet that I have maintained while working on the permit renewal (Both Lines 11-14-03). You will note that although close, the total for PM/PM10 was below 100 tons per year.

While Trinity Consultants was doing the required air modeling, we went through the emission values and made some corrections to the values indicated on the spreadsheet you received:

1) EPN 98 was deleted - this is the storage tank emissions associated with railcar unloading into the bulk asphalt storage tanks. The vents for these tanks have now been piped to the thermal oxidizer and therefore no longer discharge directly to atmosphere.
2) Due to information recently learned from stack testing at another GAF facility, I had Trinity Consultants increase the PM10 emissions from Boiler/Thermal Oxidizer. (Changed from 0.7 ton/yr to 21.9 ton/yr.

The change in PM10 emissions for the thermal oxidizer was a significant increase. We historically have not performed stack testing for PM10 and limited data is available on PM10 emissions from thermal oxidizers or afterburners that are used to burn asphalt fumes. We recently did stack testing at two of our facilities that have had PM10 limits stated in the most recent versions of the air permit. We discovered that PM10 emissions were higher than PM emissions and we believe this is due to the fact that condensable particulate is included in the count for PM10, but is not included in the PM count.

Based on the results of Internet searches on PM10 emissions, we believe the high PM10 values may result from sulfur in the asphalt fumes that are being burned. The sulfur produces SO2 when burned and then, apparently condenses in the condensable particulate cooling step of the PM10 sampling apparatus. We have found one specific research report that tested PM10 emissions levels as a function of sulfur from the burning of fuel oil. The report indicated that the PM10 emission levels increased in direct proportion to the sulfur content. (It has been questioned if this is a double count of the SO2 - PM and as SO2. No resolution for this question, as yet.)

As with the stack tested plants, the Dallas Plant boiler is also a thermal oxidizer that burns asphalt fumes. We therefore felt that the PM10 emission value needed to be increased to incorporate the new information we have learned about asphalt fume burning and PM10 emissions. Obviously I failed to update the spreadsheet after giving this revision to Trinity Consultants and I didn't realize the PMPM10 emissions now exceeded the 100 ton/yr

threshold.

NOTE:
I also noted another error on the Table 1(a) that you faxed me. The PM/PM10 emission value for EPN 34, the ESP is incorrect. The value of 1.24 lb/hr should be 3.43 and the 5.40 ton/yr should be 15.02 ton/yr. The 1.24 lb/hr and 3.43 ton/yr are emission values for Line # 3 ONLY. The ESP unit is a common control device used by both Line # 1 and Line # 3. When the Line # 1 VERP application and Line # 3 Renewal application were separate, the emissions for the ESP were divided between the two Lines as a function of production throughput. It appears that when Line # 3 and Line # 1 permit applications were combined into a single application, a note was added that the Line # 1 emissions were being added to Line # 3, but we failed to actually add the values together. (The same applies to the VOC emissions for the ESP, but they are not a Title V concern.) I will provide a revised Table 1(a).

Suggestion to resolve the Title V issue:
When reviewing the spreadsheet for PM/PM10 emissions, I note that the largest contributors are:
1) the Sand Application Baghouse (EPN 25) at 16.91 tons/ yr,
2) Line # 1 Cooling Section (EPN COOL1) @ 17.52 tons/yr,
3) Line # 3 Cooling Section (EPN COOL3) @ 26.30 tons/yr, and
4) the ESP (EPN 34) @ 15.02 tons/yr. These four (4) sources total 75.75 tons/yr.

All of the emissions values are theoretical emission calculations.
1) The large Baghouse value is simply a calculation using the BACT value of 0.01 grains/cu.ft. times the huge system flow rate of 45,000 cfm. Based on our knowledge of the process, (collecting fugitive dust from application of sand) we believe the emissions would be much lower than this, but do not have other data to use as a calculation basis.
2) The existing enclosures have been enhanced to reduce the fugitive dust that was being discharged from the cooling sections. Again, we believe these emission values are lower, but do not have data to use as a calculation basis.

I have discussed this issue with Trinity Consultants and they offered their experience from other clients with similar situations. From our discussion, we noted that the current proposed DRAFT permit requires that the above four (4) emission sources have compliance stack tests performed. Trinity Consultants states that they have had clients who have performed stack tests to generate emission values that become their permit limits.

Since we believe that the actual stack emission values would be lower than the theoretical calculated values and would yield PM/PM10 results that would be below the Major Source threshold, we would like to performed the required stack testing in order to generate emission values for the air permit.

I would like to know if this approach would be acceptable to TCEQ.

Fred Bright
973-628-3507

<<Emission Summary Both Lines July 2004.pdf>> <<Emission Summary Both Lines 11-14-03.pdf>>

GAF MATERIALS CORPORATION
1361 Alps Road Wayne NJ 07470-3689 • Tel: 973-628-3000

September 15, 2004

Mr. Jesse Chacon
Texas Commission on Environmental Quality
Office of Permitting, Remediation, and Registration
Operating Permits Section, Air Permits Division
MC 163, Building C, Floor 3
12100 Park 35 Circle
Austin, Texas 78753

Re: Abbreviated Title V Application
TCEQ Account No. DB-0378-S
Customer Reference Number (CN) 600474753
Regulated Entity Reference Number (RN) 100788959
GAF Materials Corporation – Dallas Plant – Dallas County

Dear Mr. Chacon:
GAF Materials Corporation (GAF) owns and operates an asphalt roofing materials manufacturing facility in Dallas, Texas (Dallas Plant). GAF operates under Texas Commission on Environmental Quality (TCEQ) Customer Reference Number (CN) 600474753, and the Dallas Plant operates under TCEQ Regulated Entity Reference Number (RN) 100788959.

In accordance with Title 30 of the Texas Administrative Code (30 TAC) Chapter 122, §122.130, GAF is submitting an abbreviated Title V Application. As such, a TCEQ Form OP-1 and TCEQ Form OP-CRO1 are enclosed. GAF has not changed any CORE information since the issuance of the CN or RN referenced above; therefore, a CORE Data Form has not been included with this submittal. Please note that this Title V Application is contingent upon results from stack testing, which will take place in September or early October 2004. If stack testing results show that the Dallas Plant is not a Title V major source, GAF will withdraw this application.

If you have any questions or need additional information, please contact me at my New Jersey office at (973) 628-3507.

Sincerely,

Fred Bright
Director of Environmental Engineering

Attachment

cc: Tony Walker, TCEQ Region 4
David Miller, City of Dallas
Howard Deal, GAF- Dallas
Tony Jabon, Trinity Consultants, Dallas
Michael Meister, Trinity Consultants, Dallas

ATTACHMENTS

TCEQ FORM OP-1

TCEQ FORM OP-CRO1

TCEQ

Form OP-1 (Page 1)
Site Information Summary
Federal Operating Permit Application

TCEQ Use Only

THIS FORM MUST BE SUBMITTED FOR ABBREVIATED AND FULL APPLICATIONS. Abbreviated applications may be submitted for an entire site and are not required to contain the information requested in Section X. Full applications must contain the information requested in all sections and must be submitted for each permit requested at the site. Refer to the form instructions for specific guidance to aid in completing this application. General information is provided in the Texas Commission on Environmental Quality (TCEQ) document entitled "Federal Operating Permit Application Guidance." Print or type all information. Title 30 Texas Administrative Code §§ 122.133 and 122.134 (30 TAC §§ 122.133 and 122.134) requires the submittal of a timely and complete application. A timely and complete application will receive an application shield, as defined in 30 TAC § 122.138. Failure to supply any additional information requested by the TCEQ that is necessary to process the permit application may result in loss of the application shield. Please direct any questions regarding this application form to the Office of Permitting, Remediation and Registration, Air Permits Division (APD) at (512) 239-1334 or Fax no. (512) 239-1070. Address written inquiries to Texas Commission on Environmental Quality, Office of Permitting, Remediation and Registration, Air Permits Division (MC 163), P.O. Box 13087, Austin, Texas 78711-3087.

I. COMPANY IDENTIFYING INFORMATION

A. Company Name: ***GAF Materials Corporation***

B. Customer Reference Number *(if issued)*: C N 6 0 0 4 7 4 7 5 3

C. Submittal Date: ***September 9, 2004***

II. SITE INFORMATION

A. Site Name: ***Dallas Plant***

B. Regulated Entity Reference Number *(if issued)*: R N 1 0 0 7 8 8 9 5 9

C. Primary Account Number for Site: ***DB-0378-S***

D. Indicate affected state(s) required to review permit application[1,2] *(Place an "X" in the appropriate box[es]).*

AR		CO		KS		LA		NM		OK		NA	X

E. Indicate major source classifications based on the site's potential to emit:

Pollutant	VOC	NO_x	SO_2	PM_{10}	CO	Pb	HAPS	Other
Major Source Threshold *(tons per year)*:	Varies[3]	Varies[3]	100	100	100	100	10/25	100
Major at the Site *(YES/NO)*:	*NO*	*NO*	*NO*	*YES*	*NO*	*NO*	*NO*	*NO*

F. Is the source a minor source subject to the Federal Operating Permit Program? *(YES/NO)* — *NO*

G. **Is the site within a local program area jurisdiction? *(YES/NO)*** — *YES*

H. Will emissions averaging be used to comply with any Subpart of 40 CFR Part 63? *(YES/NO)* — **NO**

I. Indicate the 40 CFR Part 63 Subpart(s) that will use emissions averaging:

III. PERMIT TYPE

A. Type of Permit Requested: *(Select only one response and place an "X" in the box.)*

Site Operating Permit (SOP)	X	Temporary Operating Permit (TOP)		General Operating Permit (GOP)	

IV. INITIAL APPLICATION INFORMATION

A. Is this submittal an abbreviated or a full application? *(Place an "X" in the appropriate box)* — Abbreviated | X | Full

B. If this is a full application, is the submittal a follow-up to an abbreviated application? *(YES/NO)*

V. CONFIDENTIAL INFORMATION

A. Is confidential information submitted in conjunction with this application? *(YES/NO)* — *NO*

TCEQ

Form OP-1 (Page 2)
Site Information Summary
Federal Operating Permit Application

VI. RESPONSIBLE OFFICIAL (RO) OR DESIGNATED REPRESENTATIVE (DR) IDENTIFYING INFORMATION		
A. RO/DR Name: (X Mr. __Mrs. __Ms. __Dr.) *Fred Bright*		
B. RO/DR Title: *Director of Environmental Engineering*		
C. Employer Name: *GAF Materials Corporation*		
D. Mailing Address: *1361 Alps Road*		
City: *Wayne*	State: *New Jersery*	Zip Code: *07470*
Territory: *N/A*	Country: *United States*	Foreign Postal Code: *N/A*
E. Internal Mail Code: *N/A*		
F. Telephone: *(973) 628-3170*	G. Fax: *(973) 628-3417*	H. E-mail: *fbright@gaf.com*

VII. TECHNICAL CONTACT IDENTIFYING INFORMATION *(If different from RO or DR information)*		
A. Technical Contact Name: (X Mr. __Mrs. __Ms. __Dr.) *Howard Deal*		
B. Technical Contact Title: *Project Engineer*		
C. Employer Name: *GAF Materials Corporation*		
D. Mailing Address: *P.O. Box 655607*		
City: *Dallas*	State: *Texas*	Zip Code: *75265-5607*
Territory: *N/A*	Country: *United States*	Foreign Postal Code: *N/A*
E. Internal Mail Code: *N/A*		
F. Delivery Address: *2600 Singleton Boulevard*		
City: *Dallas*	State: Texas	Zip Code: *75212*
Territory: *N/A*	Country: *United States*	Foreign Postal Code: *N/A*
G. Internal Mail Code: *N/A*		
H. Telephone: *(214) 637-1060*	I. Fax: *(214) 637-5202*	J. E-mail: *hdeal@gaf.com*

VIII. REFERENCE ONLY REQUIREMENTS *(For reference only)*		
A. State Senator: *Royce West*	B. State Representative: *Terri Hodge*	
C. Has the applicant paid emissions fees for the most recent agency fiscal year[4]? *(YES, NO, or NA)*		*Yes*
D. Is the site subject to bilingual notice requirements pursuant to 30 TAC § 122.322? *(YES/NO)*		***Yes***
E. Indicate the alternate language(s) in which public notice is required:		***Spanish***

TCEQ

Form OP-1 (Page 3)
Site Information Summary
Federal Operating Permit Application

IX. OFF-SITE PERMIT REQUEST *(Optional for applicants requesting the right to hold the permit at an off-site location.)*			
A. Office/Facility Name:			
B. Delivery Address:			
City:	State:	Zip Code:	
Territory:	Country:	Foreign Postal Code:	
C. Physical Location:			
D. Contact Name: (__Mr. __Mrs. __Ms. __Dr.)		E. Telephone:	
X. APPLICATION AREA INFORMATION *(Complete this section only if submitting a full application, or an update to a phased application, or an abbreviated acid rain application.)*			
A. Area Name:			
B. Delivery Address:			
City:	State:	Zip Code:	
C. Physical Location:			
D. Nearest City:	E. State:	F. Zip Code:	
G. Latitude (nearest second):	H. Longitude (nearest second):		
I. Are there any emission units that were not in compliance with the applicable requirements identified in the application at the time of application submittal? *(YES/NO)*			
J. Indicate the estimated number of emission units in the application area:			
K. Are there any emission units in the application area subject to the Acid Rain Program? *(YES/NO)*			
XI. PUBLIC NOTICE *(Complete this section only for SOP and Acid Rain Permit Applications.)*			
A. Name of public place to view application and draft permit: *Dallas Public Library: Central Library*			
B. Physical Address: *1515 Young St.*			
City: *Dallas*	Zip Code: *75201*		
C. Contact Person (Someone who will answer questions from the public, during the public notice period): (_X Mr. _ Mrs. _ Ms. _ Dr.) ***Howard Deal***			
D. Contact Mailing Address: ***P.O. Box 655607***			
City: ***Dallas***	State: ***Texas***	Zip Code: ***75265-5607***	
Territory: *N/A*	Country: ***United States***	Foreign Postal Code: *N/A*	
E. Internal Mail Code: *N/A*			
F. Telephone: *(214) 637-1060*			

Form OP-CRO1
Certification by Responsible Official
Federal Operating Permit Program

All initial permit application, permit revision, renewal, and reopening submittals requiring certification must be accompanied by this form. Updates to site operating permit (SOP) and temporary operating permit (TOP) applications (other than public notice verification materials) must be certified prior to authorization of public notice for the draft permit. Updates to general operating permit (GOP) applications must be certified prior to receiving an authorization to operate under a GOP.

I. IDENTIFYING INFORMATION	
A. Account No.: DB-0378-S	B. Regulated Entity No.: 100788959
C. Permit No.: TBA	D. Project No.: TBA
E. Area Name: Dallas Plant	
F. Company Name: GAF Materials Corporation	

II. CERTIFICATION TYPE *(Place an "X" in the appropriate box[es])*		
A. Responsible Official:	✘	
B. Duly Authorized Representative:		
C. Designated Representative (*Title IV acid rain sources only*):		
D. Alternate Designated Representative (*Title IV acid rain sources only*):		

III. SUBMITTAL TYPE *(Place an "X" in the appropriate box) (Only one response can be accepted per form)*			
✘	SOP/TOP Initial Permit Application		Permit Revision/Renewal/Reopening
	GOP Initial Permit Application		Update to Permit Application*
	Other (Describe):		

IV. CERTIFICATION OF TRUTH, ACCURACY, AND COMPLETENESS

This certification does not extend to information which is designated by the TCEQ as information for reference only.

I, Fred Bright, certify that I am the RO and that, based on information
(Name printed or typed) *(RO, DAR, DR, and/or ADR)*

and belief formed after reasonable inquiry, the statements and information dated during the time period in IV.1. below, OR on a specific date(s) in IV.2. below, are true, accurate, and complete:

Note: Enter EITHER a Time Period OR Specific Date(s) for each certification.

1. Time Period: From _____ to _____
*Start Date** *End Date**

OR

2. Specific Dates: 09/09/2004 _____ _____ _____ _____ _____ _____ _____
*Date 1** *Date 2** *Date 3** *Date 4** *Date 5** *Date 6** *Date 7** *Date 8**

* The Start and End Dates of the Time Period, or Dates 2-8 if using Specific Dates, should **only** be completed when the box for "Update to Permit Application" is marked above, or a submittal package has multiple dates recorded in the documentation. A Time Period may **not** be used if "Submittal Type" above is "Other" and the specific material being certified is "Annual Compliance Certification", "Monitoring Report", "Progress Report", "Deviation Report", or "Test Report".

Signature: _____ Signature Date: _____

Title: Director of Environmental Engineering

Form OP-CRO1
Certification by Responsible Official (Extension)
Federal Operating Permit Program

V. ADDITIONAL IDENTIFYING INFORMATION	
A. Account No.:	B. Regulated Entity No.:
C. Permit No.:	D. Project No.:
E. Area Name:	
A. Account No.:	B. Regulated Entity No.:
C. Permit No.:	D. Project No.:
E. Area Name:	
A. Account No.:	B. Regulated Entity No.:
C. Permit No.:	D. Project No.:
E. Area Name:	
A. Account No.:	B. Regulated Entity No.:
C. Permit No.:	D. Project No.:
E. Area Name:	
A. Account No.:	B. Regulated Entity No.:
C. Permit No.:	D. Project No.:
E. Area Name:	
A. Account No.:	B. Regulated Entity No.:
C. Permit No.:	D. Project No.:
E. Area Name:	
A. Account No.:	B. Regulated Entity No.:
C. Permit No.:	D. Project No.:
E. Area Name:	
A. Account No.:	B. Regulated Entity No.:
C. Permit No.:	D. Project No.:
E. Area Name:	
A. Account No.:	B. Regulated Entity No.:
C. Permit No.:	D. Project No.:
E. Area Name:	

TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Protecting Texas by Reducing and Preventing Pollution

October 21, 2004

TO: Persons on the attached mailing list

Re: Permit Number: 7711A
Asphalt and Roofing Materials Manufacturing Facility
Dallas, Dallas County
Regulated Entity Number: RN100788959
Customer Reference Number: CN600474753

This letter is your notice that the Texas Commission on Environmental Quality (TCEQ) Executive Director has issued final approval of the above-referenced application. The Executive Director's Response to Comments is attached.

You may file a **motion to overturn** with the Office of the Chief Clerk. A motion to overturn is a request for the Commission to review the TCEQ Executive Director's decision. Any motion must explain why the Commission should review the TCEQ Executive Director's decision.

A motion to overturn must be received by the Chief Clerk within 23 days after the date of this letter. A copy should also be sent to the applicant at the address on the attached mailing list and sent on the same day. The Chief Clerk's mailing address is Office of Chief Clerk, Texas Commission on Environmental Quality, MC-105, P.O. Box 13087, Austin, Texas 78711-3087. If a motion to overturn is not acted on by the Commission within 48 days after the date of this letter, then the motion shall be deemed overruled.

Please reference the regulated entity number (RN), customer reference number (CN), and permit number noted in this document in all your future correspondence for the referenced facility or site. The RN replaces the former TCEQ account number for the facility (if portable) or site (if permanent). The CN is a unique number assigned to the company or corporation and applies to all facilities and sites owned or operated by this company or corporation.

October 21, 2004
Re: Permit Number: 7711A

Individual members of the public may seek further information by calling the TCEQ Office of Public Assistance, toll free, at 1-800-687-4040.

Sincerely,

LaDonna Castañuela, Chief Clerk
Office of the Chief Clerk
Texas Commission on Environmental Quality

LDC/JAR/pll

Enclosure

cc: Mr. David Miller, Section Manager, Air Pollution Control Program, City of Dallas Environmental and Health Services, Dallas
Mr. Tony L. Walker, Air Section Manager, Region 4 - Fort Worth

Project Number: 75805

MAILING LIST FOR PERMIT NUMBER 7711A
Dallas County

FOR THE APPLICANT:

Mr. John Stromme
Plant Manager
GAF Materials Corporation
P.O. Box 655607
Dallas, Texas 75265-5607

PROTESTANTS/INTERESTED PERSONS:

Ms. Linda Magee
2408 Ainsley Drive
Flower Mound, Texas 75028

Mr. Irvin A. Uphoff
2532 Alden Avenue
Dallas, Texas 75211

FOR THE EXECUTIVE DIRECTOR:

Mr. Chris Pepper
Texas Commission on Environmental Quality
Environmental Law Division (MC-173)
P. O. Box 13087
Austin, Texas 78711-3087

Mr. Joshua Reddoch
Texas Commission on Environmental Quality
Office of Permitting, Remediation, and Registration
Air Permits Division (MC-163)
P.O. Box 13087
Austin, Texas 78711-3087

FOR OFFICE OF PUBLIC ASSISTANCE:

Ms. Bridget Bohac
Texas Commission on Environmental Quality
Office of Public Assistance (MC-108)
P.O. Box 13087
Austin, Texas 78711-3087

FOR PUBLIC INTEREST COUNSEL:

Mr. Blas J. Coy, Jr., Attorney
Texas Commission on Environmental Quality
Public Interest Counsel (MC-103)
P.O. Box 13087
Austin, Texas 78711-3087

FOR THE CHIEF CLERK:

Ms. LaDonna Castañuela
Texas Commission on Environmental Quality
Office of Chief Clerk (MC-105)
P.O. Box 13087
Austin, Texas 78711-3087

TCEQ PERMIT NO. 7711A

APPLICATION BY	§	BEFORE THE
GAF MATERIALS CORPORATION	§	TEXAS COMMISSION ON
ASPHALT AND ROOFING MATERIALS	§	ENVIRONMENTAL QUALITY
MANUFACTURING FACILITY	§	
DALLAS, DALLAS COUNTY	§	

EXECUTIVE DIRECTOR'S RESPONSE TO PUBLIC COMMENT

The Executive Director (ED) of the Texas Commission on Environmental Quality (TCEQ or the "Commission") files this Response to Public Comment (Response) on the proposed application for renewal of Permit Number 7711A. As required by 30 TEXAS ADMINISTRATIVE CODE (TAC) Section 55.156 (Rule), before an application is approved, the ED prepares a response to all timely, relevant and material, or significant comments. The Office of Chief Clerk timely received comment letters from Irvin Uphoff and Lisa Magee. Notwithstanding the limitation in the Rule to relevant and material, or significant comment, this Response addresses all timely public comments received.

Please call the TCEQ Office of Public Assistance at 1-800-687-4040 to obtain additional information about this permit application or the permitting process. Please view the TCEQ website, available at www.tceq.state.tx.us. for general information about the TCEQ.

BACKGROUND

Description of Facility

GAF Materials Corporation (Applicant) applied to the TCEQ for renewal of a permit for an asphalt and roofing materials manufacturing facility located at 2600 Singleton Boulevard, Dallas, Dallas County, Texas. The facility is currently authorized under Permit Number 7711A. Thereafter, the Applicant proposed an amendment to Permit No. 7711A, which would incorporate "grandfathered" equipment into permit number 7711A.

Procedural Background

The permit application for renewal was received on September 28, 2000, and was declared administratively complete on October 17, 2000. The Notice of Receipt and Intent to Obtain an Air Quality Permit ("notice") was authorized for publication on the October 28, 2000. The notice was published on November 9, 2000 in *Dallas Morning News*. Spanish language notice was published on November 9, 2000 in *El Extra*. A hearing request and comment letters were

received in response to this notice during the 15-day comment period ending on November 24, 2000. The hearing request was withdrawn on October 11, 2002. This Response addresses concerns raised in the comment letters.

COMMENTS AND RESPONSES

Similar comments that could be addressed by one explanatory response have been grouped to minimize redundancy.

COMMENT 1: Linda Magee comments that she is a concerned citizen within the Dallas Metroplex area, and although she comments that she does not live near the plant on Singleton Boulevard in Dallas, Texas, she does breath the same air. She comments that she is concerned about the amount of pollutants the Applicant's factory is emitting. She asks whether this facility meets or exceeds the current air quality controls set by the EPA. Irvin Uphoff comments that his health and well-being may be affected from the source emissions, and that odors could create a nuisance that may affect the enjoyment of his property.

RESPONSE 1: The Applicant's permit application was a renewal application for an asphalt and roofing materials manufacturing facility permitted under Permit No. 7711A. A renewal application does not address a facility's impacts on the surrounding area or the changes in the surrounding area. For these reasons, the review of a renewal application is limited by law, and to renew their permit the Applicant must demonstrate that the facility will continue to operate in accordance with all the requirements and conditions of the existing permit. As long as there are no changes to the facility and as long as the Applicant's compliance history reveals general compliance with environmental laws, the Applicant is eligible to renew their permit. The Commission may only impose more stringent conditions at renewal if it is necessary to avoid a condition of air pollution or to ensure compliance with otherwise applicable federal or state air quality control requirements [See TEXAS HEALTH & SAFETY CODE Section 382.055(e)].

However, this permit was recently amended. The Texas Clean Air Act (TCAA) and TCEQ rules require an evaluation of air quality permit amendment applications to determine whether adverse effects to public health, general welfare, or physical property are expected to result from a facility's proposed emissions. As part of the permit amendment evaluation process, the permit reviewer identifies all sources of air contaminants at the facility that is proposed to be modified and assures that the facility will be using the best available control technology (BACT) applicable for the sources and types of contaminants emitted. The BACT is based upon control measures that are designed to minimize the level of emissions from specific sources at a facility. According to TEXAS HEALTH & SAFETY CODE Section 382.0518, and 30 TAC Section 116.111, applying BACT results in requiring technology that best controls air emissions with consideration given to the technical practicability and economic reasonableness of reducing or eliminating emissions.

When the permit was amended, the Applicant represented that BACT would be used at the site. Using appropriate control measures will decrease the amount of air contaminants emitted into the atmosphere. Contaminants from this facility include particulate matter, nitrogen oxides, sulfur dioxide, carbon monoxide, and volatile organic compounds. The primary emission control measures applied to this facility are: the use of an electrostatic precipitator; the use of a thermal oxidizer; the use of nine baghouses/dust collectors; paving of plant roads; and applying water or environmentally sensitive chemicals on all unpaved plant roads. The draft permit requires other control measures including restrictions on visible fugitive emissions from the electrostatic precipitator, all dust collector stacks, all process heater vents, and building vents.

For many permits, potential impacts to human health and welfare or the environment are determined using air dispersion modeling that compares predicted emission concentrations from the proposed facility to appropriate state and federal standards.[1,2] The specific health-based standards or guidance levels employed in evaluating the potential emissions include the National Ambient Air Quality Standards (NAAQS); TCEQ standards contained in 30 TAC Chapter 111, specifically 30 TAC Sections 111.155 and 112.3; and TCEQ Effect Screening Levels (ESLs).[3]

The United States Environmental Protection Agency (EPA) created the NAAQS to protect sensitive members of the population such as children, the elderly, and individuals with existing respiratory conditions. The NAAQS, as defined in the federal regulations (40 Code of Federal Regulations (CFR) Section 50.2), include both primary and secondary standards. The primary standards are those which the EPA Administrator deems necessary, with an adequate margin of safety, to protect the public health, including sensitive members of the population such as children, the elderly, and individuals with existing lung or cardiovascular conditions. Secondary NAAQS are those which the Administrator deems necessary to protect the public welfare and the environment, including animals, crops, vegetation, and buildings, from any known or anticipated adverse affects associated with the presence of an air contaminant in the ambient air. The standards are set for criteria pollutants: ozone, lead, carbon monoxide, sulfur dioxide, nitrogen dioxide, and respirable particulate matter (PM).

For most permit applications, air dispersion modeling is performed. After an application's modeling review is complete, the modeling results are sent to the TCEQ's Toxicology and Risk

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[1] See the document entitled "Air Quality Modeling Guidelines" which provides details on air modeling, available on the TCEQ website at www.tnrcc.state.tx.us/permitting/airperm/nsr_permits/admt/guid_docs/rg25.pdf. Also visit the agency air modeling page at http://www.tnrcc.state.tx.us/air/aqp/airmodeling.html.

[2] Documents referenced in this response that are available on the TCEQ website are also available in printed form at a small cost from the TCEQ Publications office at 512-239-0028.

[3] To view the ESL list or obtain more information on ESLs, visit the TCEQ website at http://www.tceq.state.tx.us/comm_exec/tox/ESL.html.

Assessment section (TARA) to evaluate whether emissions from the proposed facility are expected to cause health or nuisance problems. The TARA section reviews the results from air dispersion modeling by comparing those results to the TCEQ ESLs. ESLs are constituent-specific guideline concentrations used in TCEQ's effects evaluation of constituent concentrations in air. TARA derives these guidelines, which are based on a constituent's potential to cause adverse health effects, odor nuisances, vegetative effects, or materials damage (e.g., corrosion). Health-based screening levels are set at levels lower than levels reported to produce adverse health effects, and as such are set to protect the general public, including sensitive subgroups such as children, the elderly, or people with existing respiratory conditions. Adverse health or welfare effects are not expected to occur if the air concentration of a constituent is below its ESL. If an air concentration of a constituent is above the screening level, it is not necessarily indicative that an adverse effect will occur, but rather that further evaluation is warranted. Generally, maximum concentrations predicted to occur at a sensitive receptor which are at or below the ESL would not be expected to cause adverse effects.

For the recent amendment application, appropriate air dispersion modeling was performed; and the likelihood of whether this facility's emissions would cause adverse health effects in members of the general public, including sensitive subgroups such as children, the elderly, or people with existing respiratory conditions, was determined by comparing the facility's predicted air dispersion computer modeling concentrations to the relevant state and federal standards. The permit reviewer used this facility's modeling data to verify that ground level concentrations of emissions are not likely to adversely impact off-property receptors. TCEQ background concentrations from the geographic region were used to model predicted values, and worst-case operating conditions were assumed (i.e., all processes operating simultaneously at maximum throughput and during the worst-case meteorological conditions). The overall evaluation process provides a conservative prediction that is protective of the public. The TCEQ Air Permits Division reviewed the modeling predictions, and the analysis was acceptable.

In addition to complying with the federal and state standards and guidelines, permit applicants must comply with 30 TAC Section 101.4, which prohibits nuisance conditions. This rule states, "No person shall discharge from any source whatsoever one or more air contaminants or combinations thereof, in such concentration and of such duration as are or may tend to be injurious to or to adversely affect human health or welfare, animal life, vegetation, or property, or as to interfere with the normal use and enjoyment of animal life, vegetation, or property." As long as the facility is operated in compliance with the terms of the permit, nuisance conditions or conditions of air pollution are not expected. According to the facility's maximum allowable[4] emission rate table in the draft permit, it will emit approximately 98.21 tons per year of particulate matter, 33.01 tons per year of nitrogen oxides, 3.39 tons per year of sulfur dioxide, 26.83 tons per year of carbon monoxide, and 43.77 tons per year of volatile organic compounds. These emissions are not expected to create nuisance conditions.

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[4] The term "allowable" means the maximum emission rate of a specific pollutant from a given source, as specified in the permit.

Emissions of particulate matter (PM) were evaluated for the Applicant's facility. Particles up to 50 microns (μm) in diameter are collectively referred to as "total suspended particulates" (TSP). Particulate matter includes TSP, $PM_{2.5}$, and PM_{10}. Particulate matter consists of solid particles and liquid droplets found in the air. Particles less than 10 μm in diameter (PM_{10}) are referred to as "coarse" particles and particles less than 2.5 μm in diameter are referred to as "fine" particles ($PM_{2.5}$). Sources of coarse particles include wind-blown dust, dust generated by vehicles traveling on unpaved roads, and material handling. Fine particles are usually produced via industrial and residential combustion processes and vehicle exhaust.

Some of the key health effects associated with PM exposure are aggravation of pre-existing respiratory diseases such as chronic obstructive pulmonary diseases, asthma, bronchitis, or emphysema; increased respiratory symptoms such as coughing; changes in lung tissue and structure; and altered respiratory defense mechanisms. The ability of PM to cause adverse health effects depends upon the concentration of PM to which a person is exposed, on the ability of PM to reach the sensitive regions of the respiratory system, its persistence in the body, and its toxicity.

The NAAQS for PM_{10} is based on 24-hour and annual time periods. The measurement for predicted concentrations of air contaminants in modeling exercises is expressed in terms of micrograms per cubic meter ($\mu g/m^3$). One microgram is 1/1,000,000 of a gram, or 2.2/1,000,000,000 of a pound (approximately the weight of a dust mite) of air contaminant per cubic meter of ambient air. The air volume of a cubic meter is approximately the size of a washing machine. Predicted air concentrations occurring below the 24-hour and annual NAAQS of 150 $\mu g/m^3$ and 50 $\mu g/m^3$, respectively, are not expected to exacerbate existing conditions or cause adverse health effects. Modeling for this facility resulted in predicted PM_{10} concentrations, at the facility's property line, to be 139.38 $\mu g/m^3$ (24-hour) and 49.46 $\mu g/m^3$ (annual), which are both below the NAAQS.

The regulations for particulate matter[5] are listed in 30 TAC Chapter 111. Predicted air concentrations occurring below the one-hour and three-hour state standards of 400 $\mu g/m^3$ and 200 $\mu g/m^3$, respectively, are not expected to cause nuisance conditions (dust accumulation, decreased visibility) or eye and throat irritation. Air dispersion modeling indicated the predicted air concentrations of PM at the facility's property line will be 220.78 $\mu g/m^3$ (one-hour) and 153.14 $\mu g/m^3$ (three-hour). Therefore, based on the potential concentrations reviewed by the executive director's staff, it is not expected that existing health conditions will worsen or that adverse health effects in the general public, sensitive subgroups, or animal life will occur as a result of exposure to the expected levels of PM.

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[5] State standards do not refer to PM. Rather, state standards refer to Total Suspended Particulate, or "TSP." The terms TSP and PM have been used interchangeably. However, TSP more specifically refers to all particulate matter that can be captured in a high-volume air sampler regardless of particle size, whereas PM is usually further classified by particle size; i.e. PM_{30}, PM_{10}, and $PM_{2.5}$.

Sulfur dioxide (SO_2) was evaluated for the Applicant's facility. The SO_2 NAAQS, regulated by the EPA, are based on three-hour, twenty-four hour, and annual time periods. Predicted SO_2 air concentrations occurring below the three-hour, twenty-four hour, and annual NAAQS of 1,300 $\mu g/m^3$, 365 $\mu g/m^3$, and 80 $\mu g/m^3$, respectively, are not expected to exacerbate existing conditions or cause adverse health effects. Modeling of this facility resulted in predicted air concentrations of SO_2 to be 12.34 $\mu g/m^3$ (three-hour), 4.95 $\mu g/m^3$ (twenty-four hour) and 0.62 $\mu g/m^3$ (annual), which are each below the NAAQS.

Nitrogen dioxide (NO_2) was evaluated for the Applicant's facility. The NO_2 NAAQS, regulated by the EPA, is based on an annual time period. Predicted NO_2 air concentrations occurring below the annual NAAQS of 100 $\mu g/m^3$ are not expected to exacerbate existing conditions or cause adverse health effects. Modeling of this facility resulted in predicted air concentrations of NO_2 to be 59.9 $\mu g/m^3$ (annual), which is below the NAAQS.

Carbon monoxide (CO) was modeled to determine if a state NAAQS Analysis was required. In this analysis, the resulting maximum concentrations from the sources associated with this facility are compared to the federal Modeling Significance Levels (MSL) [See 40 CFR Section 52.21(b)(23)] to determine the significance CO. Concentrations that do not exceed the MSL are considered to be so low that they do not require a state NAAQS Analysis. The CO MSL are based on one-hour and eight-hour time periods. The CO MSL are 2,000 $\mu g/m^3$ (one-hour) and 500 $\mu g/m^3$ (eight-hour). Modeling of this facility resulted in predicted air concentrations of CO to be 77.32 $\mu g/m^3$ (one-hour) and 34.52 $\mu g/m^3$ (eight-hour). Therefore, since predicted air concentrations CO occur below the MSL, a state NAAQS Analysis was not required for this pollutant.

In summary, based on the potential concentrations reviewed by the ED's staff during the recent permit amendment evaluation, it is not expected that existing health conditions will worsen, or adverse health effects in the general public, sensitive subgroups, or animal life will occur as a result of exposure to the expected levels of PM, PM_{10}, SO_2, NO_x, CO, or volatile organic compounds.

Individuals are encouraged to report any concerns about nuisance issues or suspected noncompliance with terms of any permit or other environmental regulation by contacting the TCEQ Dallas/Fort Worth Regional Office at 817-588-5800, or by calling the 24-hour toll-free Environmental Complaints Hotline at 1-888-777-3186. If the facility fails to comply with the terms and conditions of the permit, it will be subject to investigation and possible enforcement action. Citizen-collected evidence may be used in such an action. See 30 TAC Section 70.4, Enforcement Action Using Information Provided by Private Individual, for details on gathering and reporting such evidence.

The TCEQ has procedures for accepting environmental complaints from the general public. A new tool for identifying environmental problems is the citizen-collected evidence program, where individuals can provide information on possible environmental law violations and the

information can be used by the TCEQ to pursue enforcement. In this program, citizens can become involved and may eventually testify at a hearing or trial concerning the violation. For additional information, see the TCEQ publication "Do You Want to Report an Environmental Problem? Do You Have Information or Evidence?" This booklet is available in English and Spanish from the TCEQ Publications office at 512-239-0028, and may be downloaded from the agency website at www.tceq.state.tx.us (under Publications, search for Document No. 278).

COMMENT 2: Irvin Uphoff comments that the Applicant has been operating illegally by releasing non-permitted emissions that are not presently managed by accepted control technology. He also comments that the applicant failed to contain particulate matter.

RESPONSE 2: There are no violations reported at this facility, and the company has an acceptable compliance history. The Applicant represented in the permit application that BACT will be used at the proposed site. See Response 1 for more discussion on BACT.

Individuals are encouraged to report any concerns about nuisance issues or suspected noncompliance with terms of any permit or other environmental regulation by contacting the TCEQ Dallas/Fort Worth Regional Office at 817-588-5800, or by calling the 24-hour toll-free Environmental Complaints Hotline at 1-888-777-3186.

COMMENT 3: Irvin Uphoff comments that the applicant is utilizing a common boiler for the purpose of a "thermal oxidizer."

RESPONSE 3: Air emissions from asphalt storage and asphalt blowing are routed to a thermal oxidizer with a 96% destruction efficiency. The hot exhaust gases from the thermal oxidizer are routed through a boiler to produce steam for the facility.

CHANGES MADE IN RESPONSE TO PUBLIC COMMENT

No changes have been made to the draft permit.

Respectfully submitted,

TEXAS COMMISSION ON
ENVIRONMENTAL QUALITY

Glenn Shankel
Executive Director

Lydia Gonzalez, Deputy Director
Office of Legal Services

Stephanie Bergeron, Division Director
Environmental Law Division

Christopher Pepper, Staff Attorney
Environmental Law Division
State Bar No. 24034622
P.O. Box 13087, MC 173
Austin, Texas 78711-3087
(512) 239- 2679

REPRESENTING THE
EXECUTIVE DIRECTOR OF THE
TEXAS COMMISSION ON
ENVIRONMENTAL QUALITY

CERTIFICATE OF SERVICE

I certify that on July 30, 2004 the "Executive Director's Response to Public Comment" for Permit Application No.7711A was filed with Texas Commission on Environmental Quality's Office of the Chief Clerk.

Christopher B. Pepper, Staff Attorney
Environmental Law Division
State Bar No. 24034622

10/12/2004 ---------- NSR PERMITS IMS- PROJECT RECORD ----------

PROJECT#: 83987 PERMIT#: **7711A** STATUS: **P** DISP CODE: 7

RECEIVED: **07/31/2001** PROJTYPE: **RAMD** RENEWAL: **12/04/2000** ISSUED DATE: 10/21/04

FEE DATE: 07/31/2001 FEE AMT: $ 450 STDX1/SP: 0 SUP-DISP DATE: 10/15/04

GROUP: PAR

PARSTAFF2 : NELON, DONALD

GROUP: M/A

TECHENGR : REDDOCH, JOSHUA

ADMIN REVIEW

A - PAR TRANSFER TO APD :	09/27/2001	A - PAR RECEIVED :	09/27/2001	A - PN DRAFT SENT TO COMPANY :	05/25/2002
A - ADMINCOMP :	06/07/2002	A - PAR TRANSFER TO APD :	06/07/2002	A - PN DRAFT APPROVED :	06/07/2002
A - 1ST PUBLIC NOTICE :	06/07/2002	08/04/2002			

ISSUED TO: GAF MATERIALS CORPORATION

COMPANY NAME: GAF MATERIALS CORPORATION

CUSTOMER REGISTRY ID: **CN600474753**

PRIMARY CONTACT INFORMATION

CONTACT TYPE: RESPONSIBLE OFFICIAL

NAME: MR JOHN STROMME TITLE: PLANT MANAGER

PHONE: 214-637-8942 ext FAX: 214-637-5202 ext

STREET: PO BOX 655607 CITY/STATE,ZIP: DALLAS, TX , 75265-5607

CONTACT TYPE: RESPONSIBLE OFFICIAL

NAME: MR JOHN STROMME TITLE: PLANT MANAGER

PHONE: 214-637-8942 ext FAX: 214-637-5202 ext

STREET: PO BOX 655607 CITY/STATE,ZIP: DALLAS, TX , 75265-5607

PROJECT INFORMATION

UNIT: ASPHALT ROOFING MATERIALS MANUFACTURING FACILITY

SIC: 2952 REGION: 4 ACCOUNT: **DB0378S** REG ENTITY ID: **RN100788959**

SITE NAME: GAF MATERIALS CORPORATION

COUNTY: DALLAS CAPUNITS: UNITTYPE: MXASR

CAPACITY: CITY: DALLAS

LOCATION: 2600 SINGLETON BLVD

PUBLIC NOTICE

PUBLIC NOTICE REQUIRED?: Y PN1 ALT LANGUAGE: YES PN2 ALT LANGUAGE: NO

PN - ED AGENDA POST : 10/13/2004

EMISSION RATES

SURVEY :
YES

TONS/YR REDUCTION	NOX	CO	VOC	PM	SO2	OTHER	TOTAL
CONVERTED REDUCTIONS:	1.7	1.4	9.8	26.5	0	0	**39.4**
ACTUAL REDUCTIONS:	0	0	0	0	0	0	**0**
NSRP REDUCTIONS:	0	0	0	503.5	0	0	**503.5**

PROJECT NOTES

ADMINISTRATIVE: DISCUSSIONS BETWEEN E. JONES AND APPLICANT ABOUT STACK TESTING MIGHT REMOVE REQUIREMENT FOR PN. APPLICANT HAS DRAFT OF PN AND IS WAITING FOR CONFIRMATION OF STACK TEST FEASABILITY/RESULTS

ADMINISTRATIVE: PN CONTACT ON LEAVE UNTIL JUNE 10TH.

COM.TECH: TRANSFERRED FROM EJJ TO JAR 4/30/04.

TECHNICAL ACTIVITY HISTORY

TR - DFT PERMIT RFC REPLY :	02/01/2001	TR - RFC (NON-SITE RVW) REPLY :	02/01/2001	TR - TECH DEF LTR SENT :	04/05/2002	
TR - DEFICIENCY CYCLE :	04/05/2002	11/05/2003	TR - TECH DEF LTR REPLY :	04/30/2002	TR - PN VERIFICATION :	07/22/2002
TR - COMP HISTORY REVIEW CMPLT :	10/01/2003	TR - PROJ TECH COMPLETE :	10/28/2003	TR - DFT PERMIT RFC SENT :	11/18/2003	
TR - DRAFT PERMIT REVIEW :	11/18/2003	12/04/2003	TR - DFT PERMIT RFC REPLY :	12/04/2003		

PROJECT ATTRIBUTES

FEE RECEIPT NUMBER : E133674

PROJECT LINK

PROJECTS/PERMITS VOIDANCE

10/12/2004 ---------- NSR PERMITS IMS- PROJECT RECORD ----------

PROJECT#: 75805 PERMIT#: **7711A** STATUS: **P** DISP CODE: 1

RECEIVED: **09/28/2000** PROJTYPE: **RNEW** RENEWAL: ISSUED DATE: 10/21/04

FEE DATE: 09/26/2000 FEE AMT: $ 2028 STDX1/SP: 0 SUP-DISP DATE: 10/15/04

PARSTAFF1 : BLACK, RAMONA

GROUP: M/A

TECHENGR : REDDOCH, JOSHUA

ADMIN REVIEW

A - PAR RECEIVED :	09/28/2000 A - SITE REVIEW RFC :	10/10/2000 :CH :	10/10/2000
:SR :	10/10/2000 :PN :	10/16/2000 PN - APPROVED :	10/17/2000
A - PAR TRANSFER TO APD :	10/17/2000 C:-PN :	10/17/2000 C:T-DEF :	10/24/2000
E:-PN? :	11/21/2000 E:*-PN :	12/04/2000 C:T-DEF :	12/14/2000
E:T-DEF? :	01/21/2001 C:T-DEF :	02/27/2001 E:T-DEF? :	04/20/2001
E:T-DEF? :	05/04/2001 E:T-DEF? :	06/04/2001 :*CH :	01/11/2005

ISSUED TO: GAF MATERIALS CORPORATION

COMPANY NAME: GAF MATERIALS CORPORATION

CUSTOMER REGISTRY ID: **CN600474753**

PRIMARY CONTACT INFORMATION

CONTACT TYPE: RESPONSIBLE OFFICIAL

NAME: MR JOHN STROMME TITLE: PLANT MANAGER

PHONE: 214-637-8942 ext FAX: 214-637-5202 ext

STREET: PO BOX 655607 CITY/STATE,ZIP: DALLAS, TX , 75265-5607

CONTACT TYPE: RESPONSIBLE OFFICIAL

NAME: MR JOHN STROMME TITLE: PLANT MANAGER

PHONE: 214-637-8942 ext FAX: 214-637-5202 ext

STREET: PO BOX 655607 CITY/STATE,ZIP: DALLAS, TX , 75265-5607

PROJECT INFORMATION

UNIT: ASPHALT & ROOFING MATERIALS MANUFACTURING FACILI

SIC: 2952 REGION: 4 ACCOUNT: **DB0378S** REG ENTITY ID: **RN100788959**

SITE NAME: GAF MATERIALS CORPORATION

COUNTY: DALLAS CAPUNITS: UNITTYPE: MXASR

CAPACITY: CITY: DALLAS

LOCATION: 2600 SINGLETON BLVD.

PUBLIC NOTICE

PUBLIC NOTICE REQUIRED?: Y PN1 ALT LANGUAGE: NO PN2 ALT LANGUAGE: NO

	PUB MEETING	PUB HEARING	MAILING LIST	COMMENTS
NUMBER OF REQUESTS:	0	0	1	1

PN - PUBLISH : 11/09/2000 PN - END OF PERIOD : 12/11/2000 PN - END OF PERIOD : 12/11/2000

PN - HEARING REQUEST : 11/17/2001 PN - ED AGENDA POST-:-10/13/2004

EMISSION RATES

TONS/YR REDUCTION	NOX	CO	VOC	PM	SO2	OTHER	TOTAL

PROJECT NOTES

COM.STATUS: J:/everyone/rblack/75805.pn TT EJJ on 10/19/00

COM.TECH: TRANSFERRED FROM EJJ TO JAR 4/30/04.

TECHNICAL ACTIVITY HISTORY

TR - ENGINEER RECEIVE PROJECT :	10/17/2000	TR - PROJECT RECEIVED :	10/19/2000	SUP - RECEIVED FROM PAR :	10/19/2000	
TR - TECH DEF LTR SENT :	10/24/2000	TR - PN VERIFICATION :	11/21/2000	TR - SITE REVIEW RFC REPLY :	02/01/2001	
TR - TECH DEF LTR REPLY :	04/23/2001	TR - TECH DEF LTR REPLY :	06/04/2001	TR - TECH DEF LTR SENT :	09/24/2001	
TR - TECH DEF LTR REPLY :	12/12/2001	TR - TECH DEF LTR SENT :	04/05/2002	TR - 15 DAY NOD :	04/30/2002	
TR - PN VERIFICATION :	07/04/2002	TR - COMP HISTORY REVIEW CMPLT :	10/01/2003	TR - PROJ TECH COMPLETE :	10/28/2003	
TR - DFT PERMIT RFC SENT :	11/18/2003	TR - DRAFT PERMIT REVIEW :	11/18/2003	12/04/2003	TR - DFT PERMIT RFC REPLY :	11/20/2003

PROJECT ATTRIBUTES

FEE RECEIPT NUMBER : E102322

PROJECT LINK

PROJECTS/PERMITS VOIDANCE

TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Protecting Texas by Reducing and Preventing Pollution

October 21, 2004

Mr. John Stromme
Plant Manager
GAF Materials Corporation
P.O. Box 655607
Dallas, Texas 75265-5607

Re: Permit Amendment and Renewal
Permit Number: 7711A
Asphalt and Roofing Materials Manufacturing Facility
Dallas, Dallas County
Regulated Entity Number: RN100788959
Customer Reference Number: CN600474753

Dear Mr. Stromme:

This is in response to your Form PI-1, entitled "General Application for Air Preconstruction Permits and Amendments," and Form PI-1R, entitled "General Application for Air Permit Renewals," concerning the proposed amendment and renewal of Permit Number 7711A. We understand that you propose to renew the referenced permit and amend it to include additional emissions from the Line 3 cooling exhaust and include all of Line 1 (formerly grandfathered).

This will acknowledge that your application for the above-referenced amendment and renewal is technically complete as of October 28, 2003. In accordance with Title 30 Texas Administrative Code § 116.116(b) [30 TAC § 116.116(b)], and based on our review, Permit Number 7711A is hereby amended in accordance with your proposal. This information will be incorporated into the existing permit file.

Also, in accordance with 30 TAC § 116.314(a), and based on our review, your permit is hereby renewed. Enclosed is a permit for your facility. Also enclosed are new conditions and a maximum allowable emission rates table. We will appreciate your carefully reviewing the conditions of the permit and assuring that all requirements are consistently met.

This permit will be in effect for ten years from the date of approval (Commission's final decision). If this permit is appealed and the permittee does not commence any action authorized by this permit during judicial review, the term will not begin until judicial review is concluded.

Re: Permit Number: 7711A

Please reference the regulated entity number (RN), customer reference number (CN), and permit number noted in this document in all your future correspondence for the referenced facility or site. The RN replaces the former Texas Commission on Environmental Quality account number for the facility (if portable) or site (if permanent). The CN is a unique number assigned to the company or corporation and applies to all facilities and sites owned or operated by this company or corporation.

Thank you for your cooperation in sending us the information necessary to evaluate your operations and for your commitment to air pollution control. If you have any questions, please contact Mr. Joshua Reddoch at (512) 239-6115 or write to the Texas Commission on Environmental Quality, Office of Permitting, Remediation, and Registration, Air Permits Division (MC-163), P.O. Box 13087, Austin, Texas 78711-3087.

Sincerely,

For Glenn Shankle
Executive Director
Texas Commission on Environmental Quality

GS/JAR/pll

Enclosures

cc: Mr. David Miller, Section Manager, Air Pollution Control Program, City of Dallas Environmental and Health Services, Dallas
Mr. Tony L. Walker, Air Section Manager, Region 4 - Fort Worth

Project Number: 75805

TEXAS COMMISSION ON ENVIRONMENTAL QUALITY
AIR QUALITY PERMIT

A PERMIT IS HEREBY ISSUED TO
GAF Materials Corporation
AUTHORIZING THE CONTINUED OPERATION OF
Asphalt and Roofing Materials Manufacturing Facility
LOCATED AT
Dallas, Dallas County, Texas
LATITUDE 32° 46′ 40″ LONGITUDE 096° 51′ 48″

1. **Facilities** covered by this permit shall be constructed and operated as specified in the application for the permit. All representations regarding construction plans and operation procedures contained in the permit application shall be conditions upon which the permit is issued. Variations from these representations shall be unlawful unless the permit holder first makes application to the Texas Commission on Environmental Quality (commission) Executive Director to amend this permit in that regard and such amendment is approved. [Title 30 Texas Administrative Code § 116.116 (30 TAC § 116.116)]

2. **Voiding of Permit.** A permit or permit amendment is automatically void if the holder fails to begin construction within 18 months of date of issuance, discontinues construction for more than 18 consecutive months prior to completion, or fails to complete construction within a reasonable time. Upon request, the executive director may grant a onetime 18-month extension of the date to begin construction. [30 TAC § 116.120(a)]

3. **Construction Progress.** Start of construction, construction interruptions exceeding 45 days, and completion of construction shall be reported to the appropriate regional office of the commission not later than 15 working days after occurrence of the event. [30 TAC § 116.115(b)(2)(B)]

4. **Start-up Notification.** The appropriate air program regional office shall be notified prior to the commencement of operations of the facilities authorized by the permit in such a manner that a representative of the commission may be present. The permit holder shall provide a separate notification for the commencement of operations for each unit of phased construction, which may involve a series of units commencing operations at different times. Prior to operation of the facilities authorized by the permit, the permit holder shall identify to the Office of Permitting, Remediation, and Registration the source or sources of allowances to be utilized for compliance with Chapter 101, Subchapter H, Division 3 of this title (relating to Mass Emissions Cap and Trade Program). [30 TAC § 116.115(b)(2)(c)]

5. **Sampling Requirements.** If sampling is required, the permit holder shall contact the commission's Office of Compliance and Enforcement prior to sampling to obtain the proper data forms and procedures. All sampling and testing procedures must be approved by the executive director and coordinated with the regional representatives of the commission. The permit holder is also responsible for providing sampling facilities and conducting the sampling operations or contracting with an independent sampling consultant. [30 TAC § 116.115(b)(2)(D)]

6. **Equivalency of Methods.** The permit holder must demonstrate or otherwise justify the equivalency of emission control methods, sampling or other emission testing methods, and monitoring methods proposed as alternatives to methods indicated in the conditions of the permit. Alternative methods shall be applied for in writing and must be reviewed and approved by the executive director prior to their use in fulfilling any requirements of the permit. [30 TAC § 116.115(b)(2)(E)]

7. **Recordkeeping.** The permit holder shall maintain a copy of the permit along with records containing the information and data sufficient to demonstrate compliance with the permit, including production records and operating hours; keep all required records in a file at the plant site. If, however, the facility normally operates unattended, records shall be maintained at the nearest staffed location within Texas specified in the application; make the records available at the request of personnel from the commission or any air pollution control program having jurisdiction; comply with any additional recordkeeping requirements specified in special conditions attached to the permit; and retain information in the file for at least two years following the date that the information or data is obtained. [30 TAC § 116.115(b)(2)(F)]

8. **Maximum Allowable Emission Rates.** The total emissions of air contaminants from any of the sources of emissions must not exceed the values stated on the table attached to the permit entitled "Emission Sources--Maximum Allowable Emission Rates." [30 TAC § 116.115(b)(2)(G)]

9. **Maintenance of Emission Control.** The permitted facilities shall not be operated unless all air pollution emission capture and abatement equipment is maintained in good working order and operating properly during normal facility operations. The permit holder shall provide notification for upsets and maintenance in accordance with § §101.201, 101.211, and 101.221 of this title (relating to Emissions Event Reporting and Recordkeeping Requirements; Scheduled Maintenance, Startup and Shutdown Reporting and Recordkeeping Requirements; and Operational Requirements). [30 TAC § 116.115(b)(2)(H)]

10. **Compliance with Rules.** Acceptance of a permit by an applicant constitutes an acknowledgment and agreement that the permit holder will comply with all rules, regulations, and orders of the commission issued in conformity with the TCAA and the conditions precedent to the granting of the permit. If more than one state or federal rule or regulation or permit condition are applicable, the most stringent limit or condition shall govern and be the standard by which compliance shall be demonstrated. Acceptance includes consent to the entrance of commission employees and agents into the permitted premises at reasonable times to investigate conditions relating to the emission or concentration of air contaminants, including compliance with the permit. [30 TAC § 116.115(b)(2)(I)]

11. This permit may be appealed pursuant to 30 TAC § 50.139.

12. This permit may not be transferred, assigned, or conveyed by the holder except as provided by rule. [30 TAC § 116.110(e)]

13. There may be additional special conditions attached to a permit upon issuance or modification of the permit. Such conditions in a permit may be more restrictive than the requirements of Title 30 of the Texas Administrative Code. [30 TAC § 116.115(c)]

14. **Emissions** from this facility must not cause or contribute to a condition of "air pollution" as defined in TCAA § 382.003(3) or violate TCAA § 382.085, as codified in the Texas Health and Safety Code. If the executive director determines that such a condition or violation occurs, the holder shall implement additional abatement measures as necessary to control or prevent the condition or violation.

PERMIT 7711A

Date: October 21, 2004

Glenn Shankle
Executive Director
Texas Commission on Environmental Quality

SPECIAL CONDITIONS

Permit Number 7711A

EMISSION STANDARDS AND FUEL SPECIFICATIONS

1. Total emissions from these sources shall not exceed the values stated on the enclosed table entitled "Emission Sources - Maximum Allowable Emission Rates." The permitted emission limits for all emission point numbers (EPNs) are based on 8,760 annual hours of operation.

2. The fuel for this facility shall be pipeline sweet natural gas containing no more than 5 grains total sulfur and 0.25 grains hydrogen sulfide per 100 dry standard cubic feet. Use of any other fuel shall require prior written approval of the Executive Director of the Texas Commission on Environmental Quality (TCEQ).

FEDERAL APPLICABILITY

3. The holder of this permit shall comply with all requirements of the U.S. Environmental Protection Agency (EPA) regulations on Standards of Performance for New Stationary Sources promulgated for Asphalt Processing and Asphalt Roofing Manufacture in Title 40 Code of Federal Regulations Part 60 (40 CFR Part 60), Subparts A and UU.

OPACITY/VISIBLE EMISSION LIMITATIONS

4. Opacity of emissions from the Electrostatic Precipitator (EPN 34), all dust collector stacks, all process heater vents, and building vents shall not exceed 5 percent averaged over a six-minute period as determined by the EPA Test Method (TM) 9 or equivalent. There shall be no discharge into the atmosphere from any asphalt storage tank exhaust gases with opacity greater than 0 percent except for one consecutive period in any 24-hour period when the transfer lines are being blown for clearing.

5. No visible emissions from this facility operation, road, or travel area shall leave the property. Visible emissions shall be determined by a standard of no visible emissions exceeding 30 seconds in duration in any six-minute period as determined using EPA TM 22 or equivalent.

OPERATIONAL LIMITATIONS AND WORK PRACTICES

6. The company has represented the following to comply with all TCEQ rules and regulations:

   A. All filler and backing material shall be received and transferred with no visible emissions leaving the building.

   B. The emissions from blowing stills and in the following Stillyard Storage Tank Nos. T-8, T-9, T-10, T-14, T-15, T-110, and T-120 containing asphalt shall be vented to the thermal oxidizer.

   C. The maximum allowable asphalt throughput rates are 24,886 pounds per hour (lbs/hr) for Line 1, and 41,472 lbs/hr for Line 3.

   D. The maximum allowable production rate for both Lines 1 and 3 is 171 tons per hour (1,498,000 tons per year) of finished shingles.

7. An opacity violation or an odor nuisance condition, as confirmed by the TCEQ or any local air pollution control program with jurisdiction, may be cause for additional controls. If the nuisance condition persists, subsequent stack sampling may also be required.

8. All in-plant roads and areas subject to road vehicle traffic shall be paved with a cohesive hard surface and cleaned, as necessary, to maintain compliance with the TCEQ rules and regulations Unpaved work areas shall be sprayed with water and/or environmentally sensitive chemicals upon detection of visible particulate matter (PM) emissions to maintain compliance with all TCEQ rules and regulations.

INITIAL DETERMINATION OF COMPLIANCE

9. Within 180 days after the issuance date of this permit, stack sampling of the Electrostatic Precipitator (EPN 34) and the Boiler/Thermal Oxidizer Vent (EPN 8) for PM, nitrogen oxides (NO_x), sulfur dioxide (SO_2), carbon monoxide (CO), and volatile organic compounds (VOC) emissions shall occur to demonstrate compliance with the allowable emissions set forth in this permit. Also within 180 days after the issuance of this permit, stack sampling of the emissions from Line 1 cooling section (EPN COOL1) and Line 3 cooling section (COOL3) shall occur to demonstrate compliance with the allowable emissions set forth in this permit. Requests for additional time to perform sampling shall be submitted to the TCEQ Regional Office. Additional time to comply with any applicable requirements of

40 CFR Part 60 requires EPA approval, and requests shall be submitted to the TCEQ Austin Compliance Support Division.

CONTINUOUS DETERMINATION OF COMPLIANCE

10. Upon being informed by the TCEQ Executive Director that the staff has documented visible emissions from EPNs listed in Special Condition No. 4 that exceed the opacity specified in Special Condition No. 4, the holder of this permit shall conduct stack sampling analyses or other tests to prove satisfactory abatement or process equipment performance and demonstrate compliance with the PM and VOC allowables specified in the maximum allowable emission rates table. Sampling must be conducted in accordance with appropriate procedures of the TCEQ Sampling Procedures Manual or in accordance with applicable EPA Code of Federal Regulations procedures. Any deviations from those procedures must be approved by the TCEQ Executive Director prior to sampling.

SAMPLING REQUIREMENTS

11. Sampling ports and platform(s) shall be installed on the exhaust stack according to the specifications set forth in the TCEQ Sampling Procedures Manual, "Chapter 2, Stack Sampling Facilities" prior to stack sampling. Alternate sampling facility designs may be submitted for approval by the TCEQ Executive Director.

12. The holder of this permit is responsible for providing sampling and testing facilities and conducting the sampling and testing operations at their expense.

13. The plant shall operate at the maximum shingle production and raw material throughput rates and operating parameters, represented in the confidential file, during stack emissions testing being conducted for initial and/or continuing compliance demonstrations. If the plant is unable to operate at the maximum rates during initial compliance testing, then the production/throughput rates or other parameter may be limited to the rates established during testing. If stack testing was not accomplished at the maximum production/throughput rates, then such testing may be required prior to actual operations at the maximum rates.

14. A pretest meeting concerning the required sampling and/or monitoring shall be held with personnel from TCEQ before the required tests are performed. Air contaminants to be tested for and test methods to be used shall be confirmed at this pretest meeting.

The purpose of the pretest meeting is to review the necessary sampling and testing procedures, to provide the proper data forms for recording pertinent data, and to review the format procedures for submitting the test results.

C. Air contaminants to be tested for include (but are not limited to) PM, CO, SO_2, NO_x, and VOC.

D. Copies of the final sampling report shall be submitted within 30 days after sampling is completed. Sampling reports shall comply with the provisions of Chapter 14 of the TCEQ Sampling Procedures Manual. The reports shall be distributed as follows:

One copy to the TCEQ Dallas/Fort Worth Regional Office.
One copy to the TCEQ Austin Compliance Support Division.

15. A written proposed description of any deviation from sampling procedures specified in permit conditions or TCEQ or EPA sampling procedures shall be made available to the TCEQ prior to the pretest meeting. The TCEQ Regional Office shall approve or disapprove of any deviation from specified sampling procedures.

16. Requests to waive testing for any pollutant specified in the above special conditions shall be submitted to the TCEQ Office of Permitting, Remediation, and Registration, Air Permits Division.

RECORDKEEPING REQUIREMENTS

17. Records shall be kept as specified in General Condition No. 7 and made available upon request to the TCEQ or any air pollution control program having jurisdiction.

Dated October 21, 2004

EMISSION SOURCES - MAXIMUM ALLOWABLE EMISSION RATES

Permit Number 7711A

This table lists the maximum allowable emission rates and all sources of air contaminants on the applicant's property covered by this permit. The emission rates shown are those derived from information submitted as part of the application for permit and are the maximum rates allowed for these facilities. Any proposed increase in emission rates may require an application for a modification of the facilities covered by this permit.

		AIR CONTAMINANTS DATA		
Emission Point No. (1)	Source Name (2)	Air Contaminant Name (3)	Emission Rates * lb/hr	TPY**
STILLYARD OPERATION				
HTR3	T-1 Laminating Adhesive Bulk Storage Tank Heater Vent	NO_x	0.05	0.22
		SO_2	0.01	0.01
		PM_{10}	0.01	0.02
		CO	0.04	0.18
		VOC	0.01	0.01
CECO1	T-1 and T-2 Laminating Adhesive Tanks CECO Filter Vent	VOC	0.03	0.17
		PM_{10}	0.01	0.02
HTR4	T-2 Laminating Adhesive Bulk Storage Tank Heater Vent	NO_x	0.05	0.22
		SO_2	0.01	0.01
		PM_{10}	0.01	0.02
		CO	0.04	0.18
		VOC	0.01	0.01
HTR 5	Asphalt Heater for T-14 and T-15 Coating Asphalt Storage Tank and Coating Asphalt Loop Feed Tank	NO_x	0.10	0.43
		SO_2	0.01	0.01
		PM_{10}	0.01	0.03
		CO	0.08	0.36
		VOC	0.01	0.02
BLR5	Standby Boiler Vent	NO_x	3.73	16.34
		SO_2	0.02	0.09
		PM_{10}	0.28	1.23
		CO	3.13	13.71
		VOC	0.21	0.92

EMISSION SOURCES - MAXIMUM ALLOWABLE EMISSION RATES

AIR CONTAMINANTS DATA

Emission Point No. (1)	Source Name (2)	Air Contaminant Name (3)	Emission Rates * lb/hr	TPY**
8	Boiler and Thermal Oxidizer Vent Controlling Tanks T-8, T-9, T-10, T-14, T-15, T-110, T-120, and Blowstills T-13 and T-26	NO_x	1.75	7.70
		SO_2	0.73	3.20
		PM_{10}	5.00	21.90
		CO	1.28	5.60
		VOC	0.09	0.40
COMMON TO LINE 1 AND LINE 3				
34	Electrostatic Precipitator (for Line 1 and 3) Stack	VOC	3.20	14.94
		PM_{10}	3.43	15.02
98	Rail 2 Stack	PM_{10}	4.63	4.59
		VOC	0.51	0.51
LINE No. 1 OPERATION				
1-1	Line 1 Stabilizer Storage and Heater Baghouse Stack	PM_{10}	0.23	1.01
1-3	Line 1 Stabilizer Use Bin Baghouse Stack	PM_{10}	0.03	0.13
1-4	Line 1 (Surfacing Section) Dust Collector Stack No. 1	PM_{10}	0.59	2.58
1-5	Line 1 (Surfacing Section) Dust Collector Stack No. 2	PM_{10}	0.59	2.58
1-6	Line 1 (Surfacing Section) Dust Collector Stack No. 3	PM_{10}	0.59	2.58

EMISSION SOURCES - MAXIMUM ALLOWABLE EMISSION RATES

AIR CONTAMINANTS DATA

Emission Point No. (1)	Source Name (2)	Air Contaminant Name (3)	Emission Rates * lb/hr	TPY**
HTR1	Line 1 Stabilizer Thermal Fluid Heater Vent	NO_x	0.20	0.86
		SO_2	0.01	0.01
		PM_{10}	0.02	0.07
		CO	0.17	0.72
		VOC	0.01	0.05
HTR2	Line 1 Thermal Fluid Heater Vent	NO_x	0.20	0.86
		SO_2	0.01	0.01
		PM_{10}	0.02	0.07
		CO	0.17	0.72
		VOC	0.01	0.05
COOL1(total 3 stks)	Line No. 1 Cooling Section Exhaust	VOC	2.22	9.73
		PM_{10}	4.00	17.52
LINE 3 OPERATION				
25	Sand Application Baghouse Stack	PM_{10}	3.86	16.91
26A	Stabilizer Storage Baghouse Stack	PM_{10}	0.15	0.70
26B	Stabilizer Storage Baghouse Stack	PM_{10}	0.29	1.26
27	Stabilizer Heater Baghouse Stack	PM_{10}	0.09	0.40
28	Asphalt Heater Vent	NO_x	0.59	2.60
		SO_2	<0.01	0.02
		PM_{10}	0.04	0.20
		CO	0.50	2.20
		VOC	0.03	0.10

EMISSION SOURCES - MAXIMUM ALLOWABLE EMISSION RATES

AIR CONTAMINANTS DATA

Emission Point No. (1)	Source Name (2)	Air Contaminant Name (3)	Emission Rates * lb/hr	TPY**
30	Hot Oil Heater Vent (Thermal Fluid Heater)	NO_x	0.27	1.20
		SO_2	<0.01	0.01
		PM_{10}	0.02	0.10
		CO	0.23	1.00
		VOC	0.01	0.04
FUG1	Plantwide Fugitive Emissions (4)	VOC	0.43	1.88
		PM_{10}	0.91	3.97
COOL3 (total 3 stks)	Line 3 Cooling Section (3 Exhaust) Fumes from Asphalt Coater	VOC	3.38	14.80
		PM_{10}	6.00	26.30
HTR6	Line 3 Stabilizer Thermal Fluid Heater Vent	NO_x	0.60	2.58
		SO_2	<0.01	0.02
		PM_{10}	0.05	0.20
		CO	0.49	2.16
		VOC	0.03	0.14

(1) Emission point identification - either specific equipment designation or emission point number from a plot plan.
(2) Specific point source names. For fugitive sources, use an area name or fugitive source name.
(3) NO_x - total oxides of nitrogen
SO_2 - sulfur dioxide
PM_{10} - particulate matter (PM) equal to or less than 10 microns in diameter. Where PM is not listed, it shall be assumed that no particulate matter greater than 10 microns is emitted.
CO - carbon monoxide
VOC - volatile organic compounds as defined in Title 30 Texas Administrative Code § 101.1

EMISSION SOURCES - MAXIMUM ALLOWABLE EMISSION RATES

(4) Fugitive emissions are an estimate only.

* Emission rates are based on and the facilities are limited by the following maximum operating schedule:

24 Hrs/day 7 Days/week 52 Weeks/year or 8,760 Hrs/year

** Compliance with annual emission limits is based on a rolling 12-month period.

Maximum allowable Asphalt Throughput Rate: Line 1 at 24,886 lbs/hour
Line 3 at 41,472 lbs/hour

Maximum Allowable Production Rate (Line 1 plus Line 3): 171 tons/hour of finished shingles
1,498,000 tons/year of finished shingles

Dated October 21, 2004

AIR/AB037BS/7711A/P

TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Protecting Texas by Reducing and Preventing Pollution

October 21, 2004

TO: Persons on the attached mailing list

Re: Permit Number: 7711A
Asphalt and Roofing Materials Manufacturing Facility
Dallas, Dallas County
Regulated Entity Number: RN100788959
Customer Reference Number: CN600474753

This letter is your notice that the Texas Commission on Environmental Quality (TCEQ) Executive Director has issued final approval of the above-referenced application. The Executive Director's Response to Comments is attached.

You may file a **motion to overturn** with the Office of the Chief Clerk. A motion to overturn is a request for the Commission to review the TCEQ Executive Director's decision. Any motion must explain why the Commission should review the TCEQ Executive Director's decision.

A motion to overturn must be received by the Chief Clerk within 23 days after the date of this letter. A copy should also be sent to the applicant at the address on the attached mailing list and sent on the same day. The Chief Clerk's mailing address is Office of Chief Clerk, Texas Commission on Environmental Quality, MC-105, P.O. Box 13087, Austin, Texas 78711-3087. If a motion to overturn is not acted on by the Commission within 48 days after the date of this letter, then the motion shall be deemed overruled.

Please reference the regulated entity number (RN), customer reference number (CN), and permit number noted in this document in all your future correspondence for the referenced facility or site. The RN replaces the former TCEQ account number for the facility (if portable) or site (if permanent). The CN is a unique number assigned to the company or corporation and applies to all facilities and sites owned or operated by this company or corporation.

October 21, 2004
Re: Permit Number: 7711A

Individual members of the public may seek further information by calling the TCEQ Office of Public Assistance, toll free, at 1-800-687-4040.

Sincerely,

LaDonna Castañuela, Chief Clerk
Office of the Chief Clerk
Texas Commission on Environmental Quality

LDC/JAR/pll

Enclosure

cc: Mr. David Miller, Section Manager, Air Pollution Control Program, City of Dallas Environmental and Health Services, Dallas
Mr. Tony L. Walker, Air Section Manager, Region 4 - Fort Worth

Project Number: 75805

MAILING LIST FOR PERMIT NUMBER 7711A
Dallas County

FOR THE APPLICANT:

Mr. John Stromme
Plant Manager
GAF Materials Corporation
P.O. Box 655607
Dallas, Texas 75265-5607

PROTESTANTS/INTERESTED PERSONS:

Ms. Linda Magee
2408 Ainsley Drive
Flower Mound, Texas 75028

Mr. Irvin A. Uphoff
2532 Alden Avenue
Dallas, Texas 75211

FOR THE EXECUTIVE DIRECTOR:

Mr. Chris Pepper
Texas Commission on Environmental Quality
Environmental Law Division (MC-173)
P. O. Box 13087
Austin, Texas 78711-3087

Mr. Joshua Reddoch
Texas Commission on Environmental Quality
Office of Permitting, Remediation, and Registration
Air Permits Division (MC-163)
P.O. Box 13087
Austin, Texas 78711-3087

FOR OFFICE OF PUBLIC ASSISTANCE:

Ms. Bridget Bohac
Texas Commission on Environmental Quality
Office of Public Assistance (MC-108)
P.O. Box 13087
Austin, Texas 78711-3087

FOR PUBLIC INTEREST COUNSEL:

Mr. Blas J. Coy, Jr., Attorney
Texas Commission on Environmental Quality
Public Interest Counsel (MC-103)
P.O. Box 13087
Austin, Texas 78711-3087

FOR THE CHIEF CLERK:

Ms. LaDonna Castañuela
Texas Commission on Environmental Quality
Office of Chief Clerk (MC-105)
P.O. Box 13087
Austin, Texas 78711-3087

TCEQ PERMIT NO. 7711A

APPLICATION BY	§	BEFORE THE
GAF MATERIALS CORPORATION	§	TEXAS COMMISSION ON
ASPHALT AND ROOFING MATERIALS	§	ENVIRONMENTAL QUALITY
MANUFACTURING FACILITY	§	
DALLAS, DALLAS COUNTY	§	

EXECUTIVE DIRECTOR'S RESPONSE TO PUBLIC COMMENT

The Executive Director (ED) of the Texas Commission on Environmental Quality (TCEQ or the "Commission") files this Response to Public Comment (Response) on the proposed application for renewal of Permit Number 7711A. As required by 30 TEXAS ADMINISTRATIVE CODE (TAC) Section 55.156 (Rule), before an application is approved, the ED prepares a response to all timely, relevant and material, or significant comments. The Office of Chief Clerk timely received comment letters from Irvin Uphoff and Lisa Magee. Notwithstanding the limitation in the Rule to relevant and material, or significant comment, this Response addresses all timely public comments received.

Please call the TCEQ Office of Public Assistance at 1-800-687-4040 to obtain additional information about this permit application or the permitting process. Please view the TCEQ website, available at www.tceq.state.tx.us. for general information about the TCEQ.

BACKGROUND

Description of Facility

GAF Materials Corporation (Applicant) applied to the TCEQ for renewal of a permit for an asphalt and roofing materials manufacturing facility located at 2600 Singleton Boulevard, Dallas, Dallas County, Texas. The facility is currently authorized under Permit Number 7711A. Thereafter, the Applicant proposed an amendment to Permit No. 7711A, which would incorporate "grandfathered" equipment into permit number 7711A.

Procedural Background

The permit application for renewal was received on September 28, 2000, and was declared administratively complete on October 17, 2000. The Notice of Receipt and Intent to Obtain an Air Quality Permit ("notice") was authorized for publication on the October 28, 2000. The notice was published on November 9, 2000 in *Dallas Morning News*. Spanish language notice was published on November 9, 2000 in *El Extra*. A hearing request and comment letters were

received in response to this notice during the 15-day comment period ending on November 24, 2000. The hearing request was withdrawn on October 11, 2002. This Response addresses concerns raised in the comment letters.

COMMENTS AND RESPONSES

Similar comments that could be addressed by one explanatory response have been grouped to minimize redundancy.

COMMENT 1: Linda Magee comments that she is a concerned citizen within the Dallas Metroplex area, and although she comments that she does not live near the plant on Singleton Boulevard in Dallas, Texas, she does breath the same air. She comments that she is concerned about the amount of pollutants the Applicant's factory is emitting. She asks whether this facility meets or exceeds the current air quality controls set by the EPA. Irvin Uphoff comments that his health and well-being may be affected from the source emissions, and that odors could create a nuisance that may affect the enjoyment of his property.

RESPONSE 1: The Applicant's permit application was a renewal application for an asphalt and roofing materials manufacturing facility permitted under Permit No. 7711A. A renewal application does not address a facility's impacts on the surrounding area or the changes in the surrounding area. For these reasons, the review of a renewal application is limited by law, and to renew their permit the Applicant must demonstrate that the facility will continue to operate in accordance with all the requirements and conditions of the existing permit. As long as there are no changes to the facility and as long as the Applicant's compliance history reveals general compliance with environmental laws, the Applicant is eligible to renew their permit. The Commission may only impose more stringent conditions at renewal if it is necessary to avoid a condition of air pollution or to ensure compliance with otherwise applicable federal or state air quality control requirements [See TEXAS HEALTH & SAFETY CODE Section 382.055(e)].

However, this permit was recently amended. The Texas Clean Air Act (TCAA) and TCEQ rules require an evaluation of air quality permit amendment applications to determine whether adverse effects to public health, general welfare, or physical property are expected to result from a facility's proposed emissions. As part of the permit amendment evaluation process, the permit reviewer identifies all sources of air contaminants at the facility that is proposed to be modified and assures that the facility will be using the best available control technology (BACT) applicable for the sources and types of contaminants emitted. The BACT is based upon control measures that are designed to minimize the level of emissions from specific sources at a facility. According to TEXAS HEALTH & SAFETY CODE Section 382.0518, and 30 TAC Section 116.111, applying BACT results in requiring technology that best controls air emissions with consideration given to the technical practicability and economic reasonableness of reducing or eliminating emissions.

When the permit was amended, the Applicant represented that BACT would be used at the site. Using appropriate control measures will decrease the amount of air contaminants emitted into the atmosphere. Contaminants from this facility include particulate matter, nitrogen oxides, sulfur dioxide, carbon monoxide, and volatile organic compounds. The primary emission control measures applied to this facility are: the use of an electrostatic precipitator; the use of a thermal oxidizer; the use of nine baghouses/dust collectors; paving of plant roads; and applying water or environmentally sensitive chemicals on all unpaved plant roads. The draft permit requires other control measures including restrictions on visible fugitive emissions from the electrostatic precipitator, all dust collector stacks, all process heater vents, and building vents.

For many permits, potential impacts to human health and welfare or the environment are determined using air dispersion modeling that compares predicted emission concentrations from the proposed facility to appropriate state and federal standards.[1,2] The specific health-based standards or guidance levels employed in evaluating the potential emissions include the National Ambient Air Quality Standards (NAAQS); TCEQ standards contained in 30 TAC Chapter 111, specifically 30 TAC Sections 111.155 and 112.3; and TCEQ Effect Screening Levels (ESLs).[3]

The United States Environmental Protection Agency (EPA) created the NAAQS to protect sensitive members of the population such as children, the elderly, and individuals with existing respiratory conditions. The NAAQS, as defined in the federal regulations (40 Code of Federal Regulations (CFR) Section 50.2), include both primary and secondary standards. The primary standards are those which the EPA Administrator deems necessary, with an adequate margin of safety, to protect the public health, including sensitive members of the population such as children, the elderly, and individuals with existing lung or cardiovascular conditions. Secondary NAAQS are those which the Administrator deems necessary to protect the public welfare and the environment, including animals, crops, vegetation, and buildings, from any known or anticipated adverse affects associated with the presence of an air contaminant in the ambient air. The standards are set for criteria pollutants: ozone, lead, carbon monoxide, sulfur dioxide, nitrogen dioxide, and respirable particulate matter (PM).

For most permit applications, air dispersion modeling is performed. After an application's modeling review is complete, the modeling results are sent to the TCEQ's Toxicology and Risk

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[1] See the document entitled "Air Quality Modeling Guidelines" which provides details on air modeling, available on the TCEQ website at www.tnrcc.state.tx.us/permitting/airperm/nsr_permits/admt/guid_docs/rg25.pdf. Also visit the agency air modeling page at http://www.tnrcc.state.tx.us/air/aqp/airmodeling.html.

[2] Documents referenced in this response that are available on the TCEQ website are also available in printed form at a small cost from the TCEQ Publications office at 512-239-0028.

[3] To view the ESL list or obtain more information on ESLs, visit the TCEQ website at http://www.tceq.state.tx.us/comm_exec/tox/ESL.html.

Assessment section (TARA) to evaluate whether emissions from the proposed facility are expected to cause health or nuisance problems. The TARA section reviews the results from air dispersion modeling by comparing those results to the TCEQ ESLs. ESLs are constituent-specific guideline concentrations used in TCEQ's effects evaluation of constituent concentrations in air. TARA derives these guidelines, which are based on a constituent's potential to cause adverse health effects, odor nuisances, vegetative effects, or materials damage (e.g., corrosion). Health-based screening levels are set at levels lower than levels reported to produce adverse health effects, and as such are set to protect the general public, including sensitive subgroups such as children, the elderly, or people with existing respiratory conditions. Adverse health or welfare effects are not expected to occur if the air concentration of a constituent is below its ESL. If an air concentration of a constituent is above the screening level, it is not necessarily indicative that an adverse effect will occur, but rather that further evaluation is warranted. Generally, maximum concentrations predicted to occur at a sensitive receptor which are at or below the ESL would not be expected to cause adverse effects.

For the recent amendment application, appropriate air dispersion modeling was performed; and the likelihood of whether this facility's emissions would cause adverse health effects in members of the general public, including sensitive subgroups such as children, the elderly, or people with existing respiratory conditions, was determined by comparing the facility's predicted air dispersion computer modeling concentrations to the relevant state and federal standards. The permit reviewer used this facility's modeling data to verify that ground level concentrations of emissions are not likely to adversely impact off-property receptors. TCEQ background concentrations from the geographic region were used to model predicted values, and worst-case operating conditions were assumed (i.e., all processes operating simultaneously at maximum throughput and during the worst-case meteorological conditions). The overall evaluation process provides a conservative prediction that is protective of the public. The TCEQ Air Permits Division reviewed the modeling predictions, and the analysis was acceptable.

In addition to complying with the federal and state standards and guidelines, permit applicants must comply with 30 TAC Section 101.4, which prohibits nuisance conditions. This rule states, "No person shall discharge from any source whatsoever one or more air contaminants or combinations thereof, in such concentration and of such duration as are or may tend to be injurious to or to adversely affect human health or welfare, animal life, vegetation, or property, or as to interfere with the normal use and enjoyment of animal life, vegetation, or property." As long as the facility is operated in compliance with the terms of the permit, nuisance conditions or conditions of air pollution are not expected. According to the facility's maximum allowable[4] emission rate table in the draft permit, it will emit approximately 98.21 tons per year of particulate matter, 33.01 tons per year of nitrogen oxides, 3.39 tons per year of sulfur dioxide, 26.83 tons per year of carbon monoxide, and 43.77 tons per year of volatile organic compounds. These emissions are not expected to create nuisance conditions.

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[4] The term "allowable" means the maximum emission rate of a specific pollutant from a given source, as specified in the permit.

Emissions of particulate matter (PM) were evaluated for the Applicant's facility. Particles up to 50 microns (μm) in diameter are collectively referred to as "total suspended particulates" (TSP). Particulate matter includes TSP, $PM_{2.5}$, and PM_{10}. Particulate matter consists of solid particles and liquid droplets found in the air. Particles less than 10 μm in diameter (PM_{10}) are referred to as "coarse" particles and particles less than 2.5 μm in diameter are referred to as "fine" particles ($PM_{2.5}$). Sources of coarse particles include wind-blown dust, dust generated by vehicles traveling on unpaved roads, and material handling. Fine particles are usually produced via industrial and residential combustion processes and vehicle exhaust.

Some of the key health effects associated with PM exposure are aggravation of pre-existing respiratory diseases such as chronic obstructive pulmonary diseases, asthma, bronchitis, or emphysema; increased respiratory symptoms such as coughing; changes in lung tissue and structure; and altered respiratory defense mechanisms. The ability of PM to cause adverse health effects depends upon the concentration of PM to which a person is exposed, on the ability of PM to reach the sensitive regions of the respiratory system, its persistence in the body, and its toxicity.

The NAAQS for PM_{10} is based on 24-hour and annual time periods. The measurement for predicted concentrations of air contaminants in modeling exercises is expressed in terms of micrograms per cubic meter ($\mu g/m^3$). One microgram is 1/1,000,000 of a gram, or 2.2/1,000,000,000 of a pound (approximately the weight of a dust mite) of air contaminant per cubic meter of ambient air. The air volume of a cubic meter is approximately the size of a washing machine. Predicted air concentrations occurring below the 24-hour and annual NAAQS of 150 $\mu g/m^3$ and 50 $\mu g/m^3$, respectively, are not expected to exacerbate existing conditions or cause adverse health effects. Modeling for this facility resulted in predicted PM_{10} concentrations, at the facility's property line, to be 139.38 $\mu g/m^3$ (24-hour) and 49.46 $\mu g/m^3$ (annual), which are both below the NAAQS.

The regulations for particulate matter[5] are listed in 30 TAC Chapter 111. Predicted air concentrations occurring below the one-hour and three-hour state standards of 400 $\mu g/m^3$ and 200 $\mu g/m^3$, respectively, are not expected to cause nuisance conditions (dust accumulation, decreased visibility) or eye and throat irritation. Air dispersion modeling indicated the predicted air concentrations of PM at the facility's property line will be 220.78 $\mu g/m^3$ (one-hour) and 153.14 $\mu g/m^3$ (three-hour). Therefore, based on the potential concentrations reviewed by the executive director's staff, it is not expected that existing health conditions will worsen or that adverse health effects in the general public, sensitive subgroups, or animal life will occur as a result of exposure to the expected levels of PM.

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[5] State standards do not refer to PM. Rather, state standards refer to Total Suspended Particulate, or "TSP." The terms TSP and PM have been used interchangeably. However, TSP more specifically refers to all particulate matter that can be captured in a high-volume air sampler regardless of particle size, whereas PM is usually further classified by particle size; i.e. PM_{30}, PM_{10}, and $PM_{2.5}$.

Sulfur dioxide (SO_2) was evaluated for the Applicant's facility. The SO_2 NAAQS, regulated by the EPA, are based on three-hour, twenty-four hour, and annual time periods. Predicted SO_2 air concentrations occurring below the three-hour, twenty-four hour, and annual NAAQS of 1,300 $\mu g/m^3$, 365 $\mu g/m^3$, and 80 $\mu g/m^3$, respectively, are not expected to exacerbate existing conditions or cause adverse health effects. Modeling of this facility resulted in predicted air concentrations of SO_2 to be 12.34 $\mu g/m^3$ (three-hour), 4.95 $\mu g/m^3$ (twenty-four hour) and 0.62 $\mu g/m^3$ (annual), which are each below the NAAQS.

Nitrogen dioxide (NO_2) was evaluated for the Applicant's facility. The NO_2 NAAQS, regulated by the EPA, is based on an annual time period. Predicted NO_2 air concentrations occurring below the annual NAAQS of 100 $\mu g/m^3$ are not expected to exacerbate existing conditions or cause adverse health effects. Modeling of this facility resulted in predicted air concentrations of NO_2 to be 59.9 $\mu g/m^3$ (annual), which is below the NAAQS.

Carbon monoxide (CO) was modeled to determine if a state NAAQS Analysis was required. In this analysis, the resulting maximum concentrations from the sources associated with this facility are compared to the federal Modeling Significance Levels (MSL) [See 40 CFR Section 52.21(b)(23)] to determine the significance CO. Concentrations that do not exceed the MSL are considered to be so low that they do not require a state NAAQS Analysis. The CO MSL are based on one-hour and eight-hour time periods. The CO MSL are 2,000 $\mu g/m^3$ (one-hour) and 500 $\mu g/m^3$ (eight-hour). Modeling of this facility resulted in predicted air concentrations of CO to be 77.32 $\mu g/m^3$ (one-hour) and 34.52 $\mu g/m^3$ (eight-hour). Therefore, since predicted air concentrations CO occur below the MSL, a state NAAQS Analysis was not required for this pollutant.

In summary, based on the potential concentrations reviewed by the ED's staff during the recent permit amendment evaluation, it is not expected that existing health conditions will worsen, or adverse health effects in the general public, sensitive subgroups, or animal life will occur as a result of exposure to the expected levels of PM, PM_{10}, SO_2, NO_x, CO, or volatile organic compounds.

Individuals are encouraged to report any concerns about nuisance issues or suspected noncompliance with terms of any permit or other environmental regulation by contacting the TCEQ Dallas/Fort Worth Regional Office at 817-588-5800, or by calling the 24-hour toll-free Environmental Complaints Hotline at 1-888-777-3186. If the facility fails to comply with the terms and conditions of the permit, it will be subject to investigation and possible enforcement action. Citizen-collected evidence may be used in such an action. See 30 TAC Section 70.4, Enforcement Action Using Information Provided by Private Individual, for details on gathering and reporting such evidence.

The TCEQ has procedures for accepting environmental complaints from the general public. A new tool for identifying environmental problems is the citizen-collected evidence program, where individuals can provide information on possible environmental law violations and the

information can be used by the TCEQ to pursue enforcement. In this program, citizens can become involved and may eventually testify at a hearing or trial concerning the violation. For additional information, see the TCEQ publication "Do You Want to Report an Environmental Problem? Do You Have Information or Evidence?" This booklet is available in English and Spanish from the TCEQ Publications office at 512-239-0028, and may be downloaded from the agency website at www.tceq.state.tx.us (under Publications, search for Document No. 278).

COMMENT 2: Irvin Uphoff comments that the Applicant has been operating illegally by releasing non-permitted emissions that are not presently managed by accepted control technology. He also comments that the applicant failed to contain particulate matter.

RESPONSE 2: There are no violations reported at this facility, and the company has an acceptable compliance history. The Applicant represented in the permit application that BACT will be used at the proposed site. See Response 1 for more discussion on BACT.

Individuals are encouraged to report any concerns about nuisance issues or suspected noncompliance with terms of any permit or other environmental regulation by contacting the TCEQ Dallas/Fort Worth Regional Office at 817-588-5800, or by calling the 24-hour toll-free Environmental Complaints Hotline at 1-888-777-3186.

COMMENT 3: Irvin Uphoff comments that the applicant is utilizing a common boiler for the purpose of a "thermal oxidizer."

RESPONSE 3: Air emissions from asphalt storage and asphalt blowing are routed to a thermal oxidizer with a 96% destruction efficiency. The hot exhaust gases from the thermal oxidizer are routed through a boiler to produce steam for the facility.

CHANGES MADE IN RESPONSE TO PUBLIC COMMENT

No changes have been made to the draft permit.

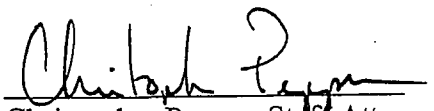
Respectfully submitted,

TEXAS COMMISSION ON
ENVIRONMENTAL QUALITY

Glenn Shankel
Executive Director

Lydia Gonzalez, Deputy Director
Office of Legal Services

Stephanie Bergeron, Division Director
Environmental Law Division



Christopher Pepper, Staff Attorney
Environmental Law Division
State Bar No. 24034622
P.O. Box 13087, MC 173
Austin, Texas 78711-3087
(512) 239- 2679

REPRESENTING THE
EXECUTIVE DIRECTOR OF THE
TEXAS COMMISSION ON
ENVIRONMENTAL QUALITY

CERTIFICATE OF SERVICE

I certify that on July 30, 2004 the "Executive Director's Response to Public Comment" for Permit Application No.7711A was filed with Texas Commission on Environmental Quality's Office of the Chief Clerk.

Christopher B. Pepper, Staff Attorney
Environmental Law Division
State Bar No. 24034622

TCEQ INTRA-AGENCY TRANSMITTAL MEMO

DATE: 30 July 2004

TO: FINAL DOCUMENTS TEAM LEADER
OFFICE OF THE CHIEF CLERK
BUILDING F, MC-105

FROM: Christopher Pepper
ENVIRONMENTAL LAW DIVISION
BUILDING A, MC-173

Attached: Executive Director's Response to Comments

Application Information
Program Area (Air, Water or Waste): AIR
Permit No. 7711A Name: GAF Materials Corporation Docket/CID Item # (if known): 19135

CHIEF CLERKS OFFICE
2004 JUL 30 PM 4:15
CLERK

OCC Action Required *(check applicable boxes)*
Date stamp and return copy to above-noted ELD Staff Attorney and:

FOR ALL PROGRAM AREAS: *(required only when changes needed to official agency mailing list)*

☐ **Update** the mailing list in your file with the attached contact names and addresses
Include corrected or additional names and addresses for mailing list

FOR WASTE & WATER:

☐ Send Response to Comments Letter which solicits hearing requests and requests for reconsideration to the mailing list in your files
For Waste and Water this would occur in all circumstances when comments have been received for 801 applications
Or

☐ Send Response to Comments Letter and Motion to Overturn Letter which solicits motions to overturn to the mailing list in your files
For Waste and Water this may occur when all comments have been withdrawn for 801 applications or when comments are received for applications that will not be set for agenda.

FOR AIR (NSR only):

☐ Send RTC with response to comments letter which solicits contested case hearing requests and requests for reconsideration to the mailing list in your files
For Air NSR applications this would occur only when there are pending contested case hearing requests (except no-increase renewals)

☐ Set for commission agenda and send RTC with agenda setting letter
This would occur when there are pending contested case hearing requests on a no-increase renewal and technical review is complete.

☐ Hold until a commission agenda date is requested and then send RTC with the Agenda Setting Letter
For Air applications this would occur when there are pending hearing requests on a no-increase renewal; but technical review is NOT complete.
If this box is checked, ED staff must call the OCC Agenda Team Leader to arrange a specific agenda date.

X Place RTC in File - no further action required by OCC
For Air NSR applications this would occur when the matter is uncontested but comments were received, APD will send a copy with MTO letter

☐ Other Instructions: _____

TCEQ PERMIT NO. 7711A

APPLICATION BY	§	**BEFORE THE**
GAF MATERIALS CORPORATION	§	**TEXAS COMMISSION ON**
ASPHALT AND ROOFING MATERIALS	§	**ENVIRONMENTAL QUALITY**
MANUFACTURING FACILITY	§	
DALLAS, DALLAS COUNTY	§	

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Similar comments that could be addressed by one explanatory response have been grouped to minimize redundancy.

COMMENT 1: Linda Magee comments that she is a concerned citizen within the Dallas Metroplex area, and although she comments that she does not live near the plant on Singleton Boulevard in Dallas, Texas, she does breath the same air. She comments that she is concerned about the amount of pollutants the Applicant's factory is emitting. She asks whether this facility meets or exceeds the current air quality controls set by the EPA. Irvin Uphoff comments that his health and well-being may be affected from the source emissions, and that odors could create a nuisance that may affect the enjoyment of his property.

RESPONSE 1: The Applicant's permit application was a renewal application for an asphalt and roofing materials manufacturing facility permitted under Permit No. 7711A. A renewal application does not address a facility's impacts on the surrounding area or the changes in the surrounding area. For these reasons, the review of a renewal application is limited by law, and to renew their permit the Applicant must demonstrate that the facility will continue to operate in accordance with all the requirements and conditions of the existing permit. As long as there are no changes to the facility and as long as the Applicant's compliance history reveals general compliance with environmental laws, the Applicant is eligible to renew their permit. The Commission may only impose more stringent conditions at renewal if it is necessary to avoid a condition of air pollution or to ensure compliance with otherwise applicable federal or state air quality control requirements [See TEXAS HEALTH & SAFETY CODE Section 382.055(e)].

However, this permit was recently amended. The Texas Clean Air Act (TCAA) and TCEQ rules require an evaluation of air quality permit amendment applications to determine whether adverse effects to public health, general welfare, or physical property are expected to result from a facility's proposed emissions. As part of the permit amendment evaluation process, the permit reviewer identifies all sources of air contaminants at the facility that is proposed to be modified and assures that the facility will be using the best available control technology (BACT) applicable for the sources and types of contaminants emitted. The BACT is based upon control measures that are designed to minimize the level of emissions from specific sources at a facility. According to TEXAS HEALTH & SAFETY CODE Section 382.0518, and 30 TAC Section 116.111, applying BACT results in requiring technology that best controls air emissions with consideration given to the technical practicability and economic reasonableness of reducing or eliminating emissions.

When the permit was amended, the Applicant represented that BACT would be used at the site. Using appropriate control measures will decrease the amount of air contaminants emitted into the atmosphere. Contaminants from this facility include particulate matter, nitrogen oxides, sulfur dioxide, carbon monoxide, and volatile organic compounds. The primary emission control measures applied to this facility are: the use of an electrostatic precipitator; the use of a thermal oxidizer; the use of nine baghouses/dust collectors; paving of plant roads; and applying water or environmentally sensitive chemicals on all unpaved plant roads. The draft permit requires other control measures including restrictions on visible fugitive emissions from the electrostatic precipitator, all dust collector stacks, all process heater vents, and building vents.

For many permits, potential impacts to human health and welfare or the environment are determined using air dispersion modeling that compares predicted emission concentrations from the proposed facility to appropriate state and federal standards.[1,2] The specific health-based standards or guidance levels employed in evaluating the potential emissions include the National Ambient Air Quality Standards (NAAQS); TCEQ standards contained in 30 TAC Chapter 111, specifically 30 TAC Sections 111.155 and 112.3; and TCEQ Effect Screening Levels (ESLs).[3]

The United States Environmental Protection Agency (EPA) created the NAAQS to protect sensitive members of the population such as children, the elderly, and individuals with existing respiratory conditions. The NAAQS, as defined in the federal regulations (40 Code of Federal Regulations (CFR) Section 50.2), include both primary and secondary standards. The primary standards are those which the EPA Administrator deems necessary, with an adequate margin of safety, to protect the public health, including sensitive members of the population such as children, the elderly, and individuals with existing lung or cardiovascular conditions. Secondary NAAQS are those which the Administrator deems necessary to protect the public welfare and the environment, including animals, crops, vegetation, and buildings, from any known or anticipated adverse affects associated with the presence of an air contaminant in the ambient air. The standards are set for criteria pollutants: ozone, lead, carbon monoxide, sulfur dioxide, nitrogen dioxide, and respirable particulate matter (PM).

For most permit applications, air dispersion modeling is performed. After an application's modeling review is complete, the modeling results are sent to the TCEQ's Toxicology and Risk

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[1] See the document entitled "Air Quality Modeling Guidelines" which provides details on air modeling, available on the TCEQ website at www.tnrcc.state.tx.us/permitting/airperm/nsr_permits/admt/guid_docs/rg25.pdf. Also visit the agency air modeling page at http://www.tnrcc.state.tx.us/air/aqp/airmodeling.html.

[2] Documents referenced in this response that are available on the TCEQ website are also available in printed form at a small cost from the TCEQ Publications office at 512-239-0028.

[3] To view the ESL list or obtain more information on ESLs, visit the TCEQ website at http://www.tceq.state.tx.us/comm_exec/tox/ESL.html.

Assessment section (TARA) to evaluate whether emissions from the proposed facility are expected to cause health or nuisance problems. The TARA section reviews the results from air dispersion modeling by comparing those results to the TCEQ ESLs. ESLs are constituent-specific guideline concentrations used in TCEQ's effects evaluation of constituent concentrations in air. TARA derives these guidelines, which are based on a constituent's potential to cause adverse health effects, odor nuisances, vegetative effects, or materials damage (e.g., corrosion). Health-based screening levels are set at levels lower than levels reported to produce adverse health effects, and as such are set to protect the general public, including sensitive subgroups such as children, the elderly, or people with existing respiratory conditions. Adverse health or welfare effects are not expected to occur if the air concentration of a constituent is below its ESL. If an air concentration of a constituent is above the screening level, it is not necessarily indicative that an adverse effect will occur, but rather that further evaluation is warranted. Generally, maximum concentrations predicted to occur at a sensitive receptor which are at or below the ESL would not be expected to cause adverse effects.

For the recent amendment application, appropriate air dispersion modeling was performed; and the likelihood of whether this facility's emissions would cause adverse health effects in members of the general public, including sensitive subgroups such as children, the elderly, or people with existing respiratory conditions, was determined by comparing the facility's predicted air dispersion computer modeling concentrations to the relevant state and federal standards. The permit reviewer used this facility's modeling data to verify that ground level concentrations of emissions are not likely to adversely impact off-property receptors. TCEQ background concentrations from the geographic region were used to model predicted values, and worst-case operating conditions were assumed (i.e., all processes operating simultaneously at maximum throughput and during the worst-case meteorological conditions). The overall evaluation process provides a conservative prediction that is protective of the public. The TCEQ Air Permits Division reviewed the modeling predictions, and the analysis was acceptable.

In addition to complying with the federal and state standards and guidelines, permit applicants must comply with 30 TAC Section 101.4, which prohibits nuisance conditions. This rule states, "No person shall discharge from any source whatsoever one or more air contaminants or combinations thereof, in such concentration and of such duration as are or may tend to be injurious to or to adversely affect human health or welfare, animal life, vegetation, or property, or as to interfere with the normal use and enjoyment of animal life, vegetation, or property." As long as the facility is operated in compliance with the terms of the permit, nuisance conditions or conditions of air pollution are not expected. According to the facility's maximum allowable[4] emission rate table in the draft permit, it will emit approximately 98.21 tons per year of particulate matter, 33.01 tons per year of nitrogen oxides, 3.39 tons per year of sulfur dioxide, 26.83 tons per year of carbon monoxide, and 43.77 tons per year of volatile organic compounds. These emissions are not expected to create nuisance conditions.

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[4] The term "allowable" means the maximum emission rate of a specific pollutant from a given source, as specified in the permit.

Emissions of particulate matter (PM) were evaluated for the Applicant's facility. Particles up to 50 microns (μm) in diameter are collectively referred to as "total suspended particulates" (TSP). Particulate matter includes TSP, $PM_{2.5}$, and PM_{10}. Particulate matter consists of solid particles and liquid droplets found in the air. Particles less than 10 μm in diameter (PM_{10}) are referred to as "coarse" particles and particles less than 2.5 μm in diameter are referred to as "fine" particles ($PM_{2.5}$). Sources of coarse particles include wind-blown dust, dust generated by vehicles traveling on unpaved roads, and material handling. Fine particles are usually produced via industrial and residential combustion processes and vehicle exhaust.

Some of the key health effects associated with PM exposure are aggravation of pre-existing respiratory diseases such as chronic obstructive pulmonary diseases, asthma, bronchitis, or emphysema; increased respiratory symptoms such as coughing; changes in lung tissue and structure; and altered respiratory defense mechanisms. The ability of PM to cause adverse health effects depends upon the concentration of PM to which a person is exposed, on the ability of PM to reach the sensitive regions of the respiratory system, its persistence in the body, and its toxicity.

The NAAQS for PM_{10} is based on 24-hour and annual time periods. The measurement for predicted concentrations of air contaminants in modeling exercises is expressed in terms of micrograms per cubic meter ($\mu g/m^3$). One microgram is 1/1,000,000 of a gram, or 2.2/1,000,000,000 of a pound (approximately the weight of a dust mite) of air contaminant per cubic meter of ambient air. The air volume of a cubic meter is approximately the size of a washing machine. Predicted air concentrations occurring below the 24-hour and annual NAAQS of 150 $\mu g/m^3$ and 50 $\mu g/m^3$, respectively, are not expected to exacerbate existing conditions or cause adverse health effects. Modeling for this facility resulted in predicted PM_{10} concentrations, at the facility's property line, to be 139.38 $\mu g/m^3$ (24-hour) and 49.46 $\mu g/m^3$ (annual), which are both below the NAAQS.

The regulations for particulate matter[5] are listed in 30 TAC Chapter 111. Predicted air concentrations occurring below the one-hour and three-hour state standards of 400 $\mu g/m^3$ and 200 $\mu g/m^3$, respectively, are not expected to cause nuisance conditions (dust accumulation, decreased visibility) or eye and throat irritation. Air dispersion modeling indicated the predicted air concentrations of PM at the facility's property line will be 220.78 $\mu g/m^3$ (one-hour) and 153.14 $\mu g/m^3$ (three-hour). Therefore, based on the potential concentrations reviewed by the executive director's staff, it is not expected that existing health conditions will worsen or that adverse health effects in the general public, sensitive subgroups, or animal life will occur as a result of exposure to the expected levels of PM.

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[5] State standards do not refer to PM. Rather, state standards refer to Total Suspended Particulate, or "TSP." The terms TSP and PM have been used interchangeably. However, TSP more specifically refers to all particulate matter that can be captured in a high-volume air sampler regardless of particle size, whereas PM is usually further classified by particle size; i.e. PM_{30}, PM_{10}, and $PM_{2.5}$.

Sulfur dioxide (SO_2) was evaluated for the Applicant's facility. The SO_2 NAAQS, regulated by the EPA, are based on three-hour, twenty-four hour, and annual time periods. Predicted SO_2 air concentrations occurring below the three-hour, twenty-four hour, and annual NAAQS of 1,300 $\mu g/m^3$, 365 $\mu g/m^3$, and 80 $\mu g/m^3$, respectively, are not expected to exacerbate existing conditions or cause adverse health effects. Modeling of this facility resulted in predicted air concentrations of SO_2 to be 12.34 $\mu g/m^3$ (three-hour), 4.95 $\mu g/m^3$ (twenty-four hour) and 0.62 $\mu g/m^3$ (annual), which are each below the NAAQS.

Nitrogen dioxide (NO_2) was evaluated for the Applicant's facility. The NO_2 NAAQS, regulated by the EPA, is based on an annual time period. Predicted NO_2 air concentrations occurring below the annual NAAQS of 100 $\mu g/m^3$ are not expected to exacerbate existing conditions or cause adverse health effects. Modeling of this facility resulted in predicted air concentrations of NO_2 to be 59.9 $\mu g/m^3$ (annual), which is below the NAAQS.

Carbon monoxide (CO) was modeled to determine if a state NAAQS Analysis was required. In this analysis, the resulting maximum concentrations from the sources associated with this facility are compared to the federal Modeling Significance Levels (MSL) [See 40 CFR Section 52.21(b)(23)] to determine the significance CO. Concentrations that do not exceed the MSL are considered to be so low that they do not require a state NAAQS Analysis. The CO MSL are based on one-hour and eight-hour time periods. The CO MSL are 2,000 $\mu g/m^3$ (one-hour) and 500 $\mu g/m^3$ (eight-hour). Modeling of this facility resulted in predicted air concentrations of CO to be 77.32 $\mu g/m^3$ (one-hour) and 34.52 $\mu g/m^3$ (eight-hour). Therefore, since predicted air concentrations CO occur below the MSL, a state NAAQS Analysis was not required for this pollutant.

In summary, based on the potential concentrations reviewed by the ED's staff during the recent permit amendment evaluation, it is not expected that existing health conditions will worsen, or adverse health effects in the general public, sensitive subgroups, or animal life will occur as a result of exposure to the expected levels of PM, PM_{10}, SO_2, NO_x, CO, or volatile organic compounds.

Individuals are encouraged to report any concerns about nuisance issues or suspected noncompliance with terms of any permit or other environmental regulation by contacting the TCEQ Dallas/Fort Worth Regional Office at 817-588-5800, or by calling the 24-hour toll-free Environmental Complaints Hotline at 1-888-777-3186. If the facility fails to comply with the terms and conditions of the permit, it will be subject to investigation and possible enforcement action. Citizen-collected evidence may be used in such an action. See 30 TAC Section 70.4, Enforcement Action Using Information Provided by Private Individual, for details on gathering and reporting such evidence.

The TCEQ has procedures for accepting environmental complaints from the general public. A new tool for identifying environmental problems is the citizen-collected evidence program, where individuals can provide information on possible environmental law violations and the

information can be used by the TCEQ to pursue enforcement. In this program, citizens can become involved and may eventually testify at a hearing or trial concerning the violation. For additional information, see the TCEQ publication "Do You Want to Report an Environmental Problem? Do You Have Information or Evidence?" This booklet is available in English and Spanish from the TCEQ Publications office at 512-239-0028, and may be downloaded from the agency website at www.tceq.state.tx.us (under Publications, search for Document No. 278).

COMMENT 2: Irvin Uphoff comments that the Applicant has been operating illegally by releasing non-permitted emissions that are not presently managed by accepted control technology. He also comments that the applicant failed to contain particulate matter.

RESPONSE 2: There are no violations reported at this facility, and the company has an acceptable compliance history. The Applicant represented in the permit application that BACT will be used at the proposed site. See Response 1 for more discussion on BACT.

Individuals are encouraged to report any concerns about nuisance issues or suspected noncompliance with terms of any permit or other environmental regulation by contacting the TCEQ Dallas/Fort Worth Regional Office at 817-588-5800, or by calling the 24-hour toll-free Environmental Complaints Hotline at 1-888-777-3186.

COMMENT 3: Irvin Uphoff comments that the applicant is utilizing a common boiler for the purpose of a "thermal oxidizer."

RESPONSE 3: Air emissions from asphalt storage and asphalt blowing are routed to a thermal oxidizer with a 96% destruction efficiency. The hot exhaust gases from the thermal oxidizer are routed through a boiler to produce steam for the facility.

CHANGES MADE IN RESPONSE TO PUBLIC COMMENT

No changes have been made to the draft permit.

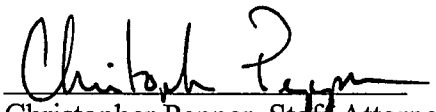
Respectfully submitted,

TEXAS COMMISSION ON
ENVIRONMENTAL QUALITY

Glenn Shankel
Executive Director

Lydia Gonzalez, Deputy Director
Office of Legal Services

Stephanie Bergeron, Division Director
Environmental Law Division



Christopher Pepper, Staff Attorney
Environmental Law Division
State Bar No. 24034622
P.O. Box 13087, MC 173
Austin, Texas 78711-3087
(512) 239- 2679

REPRESENTING THE
EXECUTIVE DIRECTOR OF THE
TEXAS COMMISSION ON
ENVIRONMENTAL QUALITY

CERTIFICATE OF SERVICE

I certify that on July 30, 2004 the "Executive Director's Response to Public Comment" for Permit Application No.7711A was filed with Texas Commission on Environmental Quality's Office of the Chief Clerk.

Christopher B. Pepper, Staff Attorney
Environmental Law Division
State Bar No. 24034622

Air/DB0378S/7711A/P

09/29/2001 **NSR PERMITS IMS - PROJECT RECORD** 08:28:12

PROJECT#: 83987 | PREPERM: | GROUP: MECH | PERMIT #: **7711A**
RECEIVED: **07/31/2001** | REG6NOV: | TECHENGR: **EJJ1** | PROJTYPE: **RAMD**
FEE DATE: | DATE BO: | Earl J. Jones | STDX1/SP:
FEE AMT.: $ 0 | BD-ORD#: - - | NEWJOBS: 0 | 182(F): N/F
PSD-TX #: <NONE>
PROJLINK: <NONE>

ISSUED TO: **GAF MATERIALS CORPORATION**

RECEIVED
AUG 1 n 2005
TCEQ
CENTRAL FILE ROOM

<PRIMARY CONTACT INFORMATION>

NAME: MR. **CAESER HAGE** TITLE: **PLANT MANAGER**
BUILDING: 2600 SINGLETON BOULEVARD PHONE: (214) 637-8919
STREET: PO BOX 655607 FAX: (214) 637-5202
CITY, STATE, ZIP: DALLAS, TEXAS, 75265-5607 COUNTRY: US

<PROJECT INFORMATION>

UNIT: **ASPHALT & ROOFING MATERIALS** SIC: REGION: 4
ACCOUNT: **DB-0378-S** CAPACITY: SCC: COUNTY: DALLAS
UNITTYPE: MXASR CAPUNITS: LAT: CITY: DALLAS
LOCATION: 2600 SINGLETON BOULEVARD LONG:
DETAIL:

PAR RECD: 09/27/2001 | DEFICIENT LETTER: | RFC-SR:
PAR TRANS: | TECH. COMPLETE: | RFC-DSC:
PAR STAFF: / | COMPLETE LETTER: | ADMIN DEFICIENT:
ADMINCOMP: | ED AGENDA POST: | ESOC:
TRANSENGR:

<TONS/YR REDUCTION>	NOX	CO	VOC	PM	SO2
NSRP REDUCTIONS	0.0	0.0	0.0	0.0	0.0

STATUS: SOS, F&C, Srdclt

<PROJECT ACTIVITY HISTORY>

NO	DATE	CODE	NO	DATE	CODE	TELCONS	NO	MISC.	MIS CODE
1	/ /		1	/ /		/ /	1	/ /	SR
2	/ /		2	/ /		/ /	2	/ /	CH
3	/ /		3	/ /		/ /	3	/ /	DAL
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<CODES: E=ENGINEER, C=COMPANY, O=OTHER, ?=PARTIAL, *=COMPLETE>

NSPS CODE:	N.A. COUNTY: **YES**	NON-PSD-MAJOR: ???	**<LOCAL PROGRAMS>**
NESHAP CODE:	N.A.NET.REQ: ???	PSD NET. REQ: ???	COUNTY: **NO**
MACT CODE: ???	N.A.REV.REQ: ???	PSD REV. REQ: ???	CITY: **YES**

<PROJECT DISPOSAL>

CHIEF SIGN: BY:
DATE ISSUED: CODE:

PROCESSING DAYS & RESPONSIBILITY **09/29/2001**

>> ENG: 60 **COMP: 0** **OTHER: 0**

WARN: 210 Days till BACKLOG.

CREATE A MIKEY

TO: Lucy Bartley, CORE Section

FROM: R. Hyde
Team Leader/Section Manager

DATE: 9/26/01

Form received in CORE Section:
(DATE)_____ by_____
Record No. 83981

For CORE Section use only

☐ Please DO NOT conduct a CORE administrative review *(check box if applicable)*.

IMPORTANT ☛ Please attach all project information submitted by the applicant; however, if an administrative review will not be done by CORE, only the application form need be attached. Please provide BOTH sides of Forms PI-1 and PI-1R.

Project Rec'd: 7 / 31 / 01
mm / dd / yy

Group: CHEM COAT COMB MECH
(circle one)

Tech. Engr.: EJJ1 Earl Jones

Project No.: 7711A Std. Ex. No._____ Std. Permit No._____
(if known) *(if applicable)* *(if applicable)*

Project Type: RAMD *(examples: CRVW, RAMD, XLTR, RNEW, MISC, etc.)*

Unit Type: MXASR *(example: RFBLRG for refinery gas-fired boiler)*

The following information will be taken directly from the application. Do not fill in these blanks unless you wish to change information shown on the application form:

Unit Name: ASPHALT & ROOFING MATERIALS

Issued To: GAF MATERIALS CORPORATION

Contact Name: CAESAR HAGE

Contact Title: PLANT MANAGER

Contact Mail Address: P.O. BOX 655607

Contact City/State/Zip: DALLAS, TX. 75265-5607

Project City: DALLAS County: DALLAS Region: 4

Account No.: DB-0378-S *(example: AB-1234-Q)*

TNRCC

RECEIVED
JUL 31 2001
AIR PERMITS DIVISION

TEXAS NATURAL RESOURCE CONSERVATION COMMISSION
FORM PI-1, GENERAL APPLICATION AIR QUALITY PERMIT

FORM PI-1

A PERMIT TO CONSTRUCT MUST BE APPROVED BEFORE ANY ACTUAL WORK IS BEGUN ON THE FACILITY. This is not a stand alone document. Please refer to the "Form PI-1, Permit Application Instructions" manual for specific details to complete this application. Please print or type all information. Please contact the Air Permits Division with any questions at (512)239-1240, Fax: (512)239-1300. Written inquiries may be addressed to: Texas Natural Resource Conservation Commission, Office of Permitting, Remediation, and Registration, Air Permits Division, MC-162, P.O. Box 13087, Austin TX 78711-3087.

☆☆☆ **VERY IMPORTANT** ☆☆☆

I. A. Is **CONFIDENTIAL** information being submitted with this application? **[ ] YES [X] NO**
If **"YES"**, is each "confidential" page so marked in big red letters? **[ ] YES [X] NO**

B. Are administrative completeness and completeness checklists attached to this application? **[ ] YES [X] NO**

C. Is this application in response to or related to a **Notice of Violation** (NOV) at this location? **[ ] YES [X] NO**
If **"YES"**, date of NOV: _____ and the specific TNRCC rule(s) violated: _____

D. Please furnish the following information pertaining to this facility **site**:
1. Please estimate the net number of new jobs which will be created in the community as a result of the operation of the facility authorized by this application: **NA**
2. Name of elected State Senator: **Royce West** District No.: **23**
3. Name of elected State Representative: **Terri Hodge** District No.: **100**

E. Does the company (including subsidiaries and parent companies) employ 100 or fewer persons? **[ ] YES [X] NO**

F. Please furnish the following information pertaining to **compliance history**:
Submit a five-year compliance history in accordance with 30 Texas Administrative Code §§ 116.120-116.126 (30 TAC §§ 116.120-116.126) for all facilities classified in Sections V.C and V.D of Form PI-1 below.

G. Please list the location (public place **in the county** where the facilities are/will be located) where you are planning to place a copy of the application for public review and copying during the public comment period.
Name of Public Place: **Probate Court at Law No. 1** (e.g., county courthouse, public library, etc.)
Address: **500 Main Street**
City: **Dallas** County: **Dallas**

II. TYPE OF APPLICATION Permit No.: **R – 7711A** (if known)

Action Type Requested *(check all that apply)*:

Initial: [ ] Permit [ ] Flexible Permit [ ] Nonattainment [ ] Prevention of Significant Deterioration
[ ] Hazardous Pollutants [FCAA § 112(g)] [ ] Multiple Plant [ ] Other: _____

Does this action result in the permitting of any grandfathered facilities? **[ ] YES [X] NO**

Changes: [X] Amendment	[ ] New Construction [X] Change with Insignificant Emissions Increases [ ] Modification with Significant Emissions Increases
[ ] Change in Location of Previously Permitted Facilities	[ ] Permit [ ] Special Permit [ ] Flexible Permit [ ] Other: _____

RECEIVED
SEP 27 2001
Air & Waste Applications Team

A. Permit Issued to: **GAF Materials Corporation**
[Entity legally responsible for permit; i.e., Owner or Operator of the facility]
Permittee's Texas State Comptroller's Tax ID No.: **12232762901**
Permittee's Address (Person, Title, Address): **Caesar Hage – Plant Manager**
PO Box 655607
Dallas, Texas 75265-5607 Telephone: (**214**) **637** - **8919** Fax: (**214**) **637** - **5202**
Permittee's Technical Contact (Person, Title, Address) and Designated to Be Contacted by the General Public During the Public Notice Period: **Caesar Hage – Plant Manager**
PO Box 655607
Dallas, Texas 75265-5607 Telephone: (**214**) **637** - **8919** Fax: (**214**) **637** - **5202**
B. Owner of Facility: **Building Materials Corporation of America**
[If different from permittee; include names of proprietor/general partner(s) if applicable]
Owner's Texas State Comptroller's Tax ID No.: **12232762901**
Owner's Address (Person, Title, Address): **Fred Bright - Director of Environmental Engineering**
1361 Alps Road, Wayne, NJ 07470
C. Principal Company Product or Business: **Asphalt Roofing Materials Mfg. Facility**
Plant Standard Industrial Classification Code: **2952**

III. FACILITY PHYSICAL LOCATION
A. Name of Plant or Site: **GAF Materials Corporation**
B. Street Address: **2600 Singleton Boulevard**
C. Nearest City: **Dallas** County: **Dallas** Site Zip Code: **75212**
D. Latitude: **32** ° **46** ' **40** "N Longitude: **96** ° **51** ' **48** "W (must be to nearest second)
E. Plant Site TNRCC Air Quality Account Number: **DB** - **0378** - **S**

IV. FACILITY TYPE AND OPERATING SCHEDULE
A. Name of Facility to Be Permitted: **GAF Materials Corporation**
B. Facility Type (Check One): **[X]** Permanent **[ ]** Portable
C. Facility Operating Schedule: (**24**)Hours/Day (**7**)Days/Week (**52**)Weeks/Year
[ ] Seasonal - Explain: **NA**
D. Start Dates (Proposed/Actual): Construction: ___/___/___ (P/A)_____Operation: ___/___/___ (P/A)

V. FACILITY CLASSIFICATION (CHECK ONLY ONE BLOCK)
A. **[ ]** New Permitted Facility - New Grass Roots Facility at this Location
B. **[ ]** New Permitted Facility - Modification of Existing Non-permitted Facility
C. **[X]** Amendment to Permitted Facility - Permit No.(s): **R-7711A**
D. **[ ]** Change in Location of Permitted Facility - Permit No.(s): _____
Location of Present Facility: _____

VI. COMPLIANCE HISTORY (SEE ATTACHED SUPPLEMENTAL INFORMATION SHEET)
A. **[ ]** Exemption Claimed Under 30 TAC § 116.121; or
B. **[X]** Existing Site Is More than or Equal to Five Years Old - TNRCC Will Compile Compliance History; or
C. **[ ]** New Site (A New Grass Roots Site With No Operating History) - Does Applicant Have Similar Facilities in Texas?
[ ] YES [ ] NO*; or
D. **[ ]** Existing Site Is Less Than Five Years Old - Does Applicant Have Similar Facilities in Texas?
[ ] YES [ ] NO*
NOTE: If either "C" or "D" is **"NO"**, attach one of the following:
1. **[ ]** Compliance History for similar sites in other states, if none:
2. **[ ]** Compliance History as required by 30 TAC § 116.122(b).

VII. SUBMIT THE FOLLOWING GENERAL INFORMATION

A. Submit a current area map as specified in the Form PI-1, Permit Application Instructions.
Are any schools located within 3,000 feet of this facility? **[X] YES [ ] NO**

B. Submit a plot plan of the plant property as specified in the Form PI-1, Permit Application Instructions.

C. Submit emission data, including fugitive emissions and stack parameters, on Table 1(a).
Attach emission calculations and information showing how emissions were determined. See Form PI-1, Permit Application Instructions for further details.

D. Submit an analysis of Source Reduction Alternatives and Best Available Control Technology, including the estimated installed capital and operating costs for all source reduction and abatement equipment associated with the facility. See Form PI-1, Permit Application Instructions for further details.

☆☆☆ VERY IMPORTANT ☆☆☆

E. Franchise Tax: Is your company in good standing with the State Comptroller's Office? See Form PI-1, Permit Application Instructions if you are not a corporation or for further information. **[X]YES [ ]NO**

F. Permit Fee: Enclose required fee, fee certification and estimated capital cost (Table 30); or furnish explanation why fee is not required. (see 30 TAC § 116.141)

G. Submit actual emissions (tons per year) for the last two years to determine federal applicability.

H. Are there any exemptions or grandfathered units related to this permit that you wish to incorporate into the permit or amendment at this time? **[ ] YES [X] NO**
If **"YES"** provide information on these units.

VIII. SUBMIT (A) PROCESS FLOW DIAGRAM, (B) PROCESS DESCRIPTION AND (C) MATERIAL BALANCE AS SPECIFIED IN THE INSTRUCTIONS (SEE INSTRUCTIONS CONCERNING SUBMITTAL OF CONFIDENTIAL INFORMATION)

IX. GENERAL APPLICATION REQUIREMENTS

Submit itemized information and/or analysis that will demonstrate that all general application requirements as specified in 30 TAC § 116.111 are met. **Each requirement in 30 TAC § 116.111 must be addressed in this application.** See Form PI-1, Permit Application Instructions for further details. Atmospheric dispersion modeling may be required as part of the air quality impact analysis per 30 TAC § 116.111(9).

Is this facility a **MAJOR SOURCE/MODIFICATION/RECONSTRUCTION** with regard to one of the following:

1. Title 30 TAC § 116.111(7) - Nonattainment **[ ] YES [X] NO**
   If **"YES"**, signature on PI-1 indicates compliance with 30 TAC § 116.150(2).
2. Title 30 TAC § 116.111(8) - Prevention of Significant Deterioration **[ ] YES [X] NO**
3. Federal Clean Air Act § 112(b) - Hazardous Air Pollutants **[ ] YES [X] NO**

Does a Maximum Achievable Control Technology standard in Title 40 Code of Federal Regulations Part 63 apply to this facility? **[ ] YES [X] NO**

Is this facility located at a major source as defined in 30 TAC Chapter 122? **[ ] YES [X] NO**

X. APPEAL PROCESS

Title 30 TAC § 116.114(a)(3) should be consulted for the procedure to be used to appeal the failure of the TNRCC to process an application within the prescribed time limits.

XI. A COPY OF THIS APPLICATION AND ALL ATTACHMENTS MUST BE SENT by the applicant to the U.S. Environmental Protection Agency, Region 6 Office in Dallas if Prevention of Significant Deterioration or Nonattainment Review is applicable in any form, the appropriate TNRCC Regional Office and to any local air pollution control program having jurisdiction. Copies of the application were sent to:

EPA Region 6 Office in Dallas **[ ] YES [X] NA**

TNRCC Regional Office sent to (city): **Arlington**

Copies sent to these local programs: **[ ] NA**

1. **City of Dallas** 2. _____

XII. TITLE 30 TAC § 116.110(D) - PROFESSIONAL ENGINEER (P.E.) SEAL

Is the estimated capital cost of the project for which application is made greater than $2 million dollars? [ ] YES [X] NO

If "YES", application must be submitted under seal of a Texas registered P.E., unless exemption is claimed pursuant to the Texas Engineering Practice Act.

[ ] Exemption is claimed pursuant to Section _____ of the TEPA.

XIII. THE INTERNATIONAL BOUNDARY WATER COMMISSION (IBWC) wishes to be notified of any new construction within 100 kilometers of the Rio Grande River. For the mailing address of the IBWC, please refer to the Form PI-1, Permit Application Instructions.

XIV. I, BRIAN CAREY, PLANT ENGINEER

[Name - Please print or type] [Title: Owner, Plant Manager, President, Environmental Director, etc.]

state that I have knowledge of the facts herein set forth and that the same are true and correct to the best of my knowledge and belief. I further state that to the best of my knowledge and belief, the project for which application is made will not in any way violate any provision of the Texas Water Code (TWC), Chapter 7, Texas Clean Air Act (TCAA), as amended, or any of the air quality rules and regulations of the Texas Natural Resource Conservation Commission or any local governmental ordinance or resolution enacted pursuant to the TCAA. I further state that I have read and understand TWC §§ 7.177-7.183, which defines CRIMINAL OFFENSES for certain violations, including intentionally or knowingly making or causing to be made false material statements or representations in this application, and TWC §§ 7.187, pertaining to CRIMINAL PENALTIES.

DATE: 7/18/01 SIGNATURE: _____

NOTE - ORIGINAL SIGNATURE IN INK IS REQUIRED.

RECEIVED

SEP 27 2001

Air & Waste Applications Team

TNRCC

TEXAS NATURAL RESOURCE CONSERVATION COMMISSION
OFFICE OF PERMITTING, AIR PERMITTING DIVISION

AIR QUALITY APPLICATION ADMINISTRATIVE COMPLETENESS CHECKLIST

Company: GAF Materials Corporation | Permit No: R-7711A | Account ID No: DB - 0378 - S
Facility Type: Asphalt and Roofing Materials Mfg. | Location: 2600 Singleton Blvd., Dallas, Texas 75212
Tech Contact: Caesar Hage – Plant Manager | City: Dallas | County: Dallas | Region: 4

Date Rec'd by TNRCC: | Date Rec'd by Eng: | Other:
Technical Section: | Technical Eng: | Date Admin Complete:

Action Type Requested *(check all that apply)*:

Initial ☐ Permit ☐ Flexible Permit ☐ Nonattainment ☐ Prevention of Significant Deterioration
☐ Hazardous Pollutants {112(g)} ☐ Multiple plant ☐ Other:

Changes [X]Amendment
☐ New construction
[X] change with insignificant emissions increases
☐ modification with significant emissions increases

☐ Change in Location of previously permitted facilities
☐ Permit ☐ Special Permit ☐ Flexible Permit
☐ Other:

Required Information*	Applicant Use	TNRCC Complete	TNRCC Incomplete	Comments
Appropriate Application Form PI-1	X			
Original & Signed Application Form	X			
Contact Name, address & phone #	X			
Type of Action/Application	X			
Minimum Appropriate Fee & Table 30	X			
Facility Type/Project Description	X			
Location of Facilities	X			
Location where file is for public copying	X			
Small Business Information	X			
Confidential Information (public notation)	X			
Criteria Air Contaminants Identified	X			
Quantity of Emissions (tpy)**	X			

** A determination of Administrative Completeness does not constitute a review of the application for demonstration of compliance with 30 TAC Chapter 116 requirements, but instead is an indication that there is enough information to begin a review for these requirements.*
*** Emissions need to be quantified to the extent that the reviewing engineer can determine the type(s) of actions are required and whether notice would be required.*

RECEIVED
SEP 27 2001
Air & Waste Applications Team

TEXAS NATURAL RESOURCE CONSERVATION COMMISSION
OFFICE OF PERMITTING, AIR PERMITTING DIVISION

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Facility Type: Asphalt and Roofing Materials Mfg. | Location: 2600 Singleton Blvd., Dallas, Texas 75212
Tech Contact: Caesar Hage – Plant Manager | City: Dallas | County: Dallas | Region: 4

Technical Section:_____ Technical Eng:_____ Date Complete:_____

	Applicant Use	TNRCC Complete	TNRCC Incomplete	Comments
Other Information:				
NOV-related action/notification	X			
Net number of new jobs created	X			
Names of affected state legislators	X			
Permittee Name, Tax ID & Address	X			
Product/Business & SIC Code	X			
Latitude & Longitude	X			
TNRCC Permit / Account ID #s	X			
Start Dates	X			SOC:_____ SOP:_____
Compliance History	X			[ ] new site [ ] < 5 yr [x] > 5yr
Franchise Tax Certificate	X			
Copy to EPA Region 6 office	X			
Copy to TNRCC Region office	X			
Copy to Local Program office	X			Arlington
Int'l Boundary Water Comm notified	X			
Application Sealed by P.E.	X			
Technical Review Requirements:				
Operating Schedule	X			
Area Map w/ school < 3000' marked	X			
Detailed Plot Plan	X			
Table 1(a) & emissions calculations	X			
Source Reduction & BACT Analysis	X			
Actual emissions for last 2 years	X			
Exempt or GF units rolled int permit	X			
Process Flow Diagram	X			
Process Description	X			
Material Balance	X			
§116.111(1) TNRCC Rules & Regulations	X			
§116.111(2) emissions measurement	X			
§116.111(3) BACT Analysis	X			
§116.111(4) NSPS	X			
§116.111(5) NESHAPs	X			
§116.111(6) Facility Performance	X			
§116.111(7) Nonattainment Review	X			
§116.111(8) PSD Review	X			
§116.111(9) Impacts / Modeling	X			
FCAA §112(g) - HAP	X			
TAC 113 - MACT	X			
Major Source	X			

GAF MATERIALS CORPORATION
2600 Singleton Blvd Po Box 655607 Dallas TX 75265-5607 • Tel: 214 637-1060

Z 302 629 932

July 12, 2001

Mr. Earl J. Jones, P.E.
Air Permits Division
Texas Natural Resource Conservation Commission (TNRCC)
12100 Park 35 Circle, MC162
Building C, Room 253E
Austin, Texas 78753

Subject: Permit Application Revision
Renewal Application for Permit No. R-7711A
GAF Materials Corporation – Dallas, Texas Facility
TNRCC ID No. DB-0378-S

Dear Mr. Jones:

In response to your July 9, 2001 e-mail, we are submitting the enclosed revision to the air permit renewal application for the GAF Materials Corporation Dallas facility. This revision incorporates the additional fugitive VOC emissions from the roofing Line #3 as the asphalt covered sheet travels from the coating dip pan into the cooling section.

Rather than reissue the original permit application in its entirety, I have attached only the pages in the original permit application that have change and have marked them "Revised 07/10/2001" per the instructions found in the TNRCC "Air Permits Application Instructions PI-1 Form" document. The following documents are enclosed:

1) Completed TNRCC Form PI-1, submitted for this permit application "Amendment",
2) Revision 1 - Revised 07/10/2001 of Table 1(a) Emission Sources. This Revision 1 should be inserted behind tab "**6. Table 1(a) (Emission Summary Table)**" to replace the existing Table 1(a) in our original air permit renewal application dated September 20, 2000. [The fugitive VOC emissions have been added to the Table 1(a) list of emissions.]
3) Revision 1 - Revised 07/10/2001 marked on Page 5-8. This is a new page that should be inserted behind tab "**5. Emission Data**" in our original air permit renewal application dated September 20, 2000. It is a page being added to this section to include backup calculations for the fugitive VOC that were added under Item 2 above.

All of the other data, drawings, maps, material balances, and supplemental information of the original air permit renewal application remain unchanged.

Regarding the applicability of PBR 106.472 to the blown asphalt storage tanks, we are presently evaluating this equipment with an outside consultant. We are expecting the results from this evaluation this week and will be in contact with you to update you on this situation.

GAF MATERIALS CORPORATION
2600 Singleton Blvd Po Box 655607 Dallas TX 75265-5607 • Tel: 214 637-1060

We would also like clarification on exactly how the permitting information relating to the blown asphalt storage tanks should be handled for permitting purposes. It is our interpretation that these tanks were not covered by existing air permit No, R-7711A, and they have now been included with the recently submitted VERP permit application as part of the existing equipment thought to be grand-fathered. Should the permitting of these tanks be addresses with the VERP application or, as part of permit R-7711A renewal?

Sincerely,

Brian Carey
Plant Engineer

Enclosure

cc: Mr. Toney Walker, TNRCC Region 4
Mr. Steve Hill, City of Dallas Department of Health and Human Services
Mr. Caesar Hage, GAF Materials Corporation – Dallas
Mr. Fred Bright, GAF Materials Corporation – Wayne, NJ

5.8 EMISSION S CALCULATION FOR FUGITIVE VOCS FROM THE ASPHALT COATING OPERATION (EPN FUG1)

Asphalt is applied to the non-woven fiberglass substrate mat as it is pulled through the liquid asphalt re-circulated through the coating dip pan, or "coater". The hot liquid asphalt produces fumes from a) being at an elevated temperature, and b) the disturbance of the liquid surface as the fiberglass mat passes through. The asphalt fumes rising from the dip pan are pulled into an overhead collection hood by an exhaust fan system. The collected asphalt fumes are directed to a control device.

The fiberglass mat, with the applied asphalt, passes between scraper blades that remove excess asphalt to create the desired finished thickness for the production of roofing shingles. The asphalt applied to the fiberglass mat is still hot as it exits the dip pan and travels to the cooling section where it is cooled to an acceptable temperature for cutting and packaging. Minor quantities of asphalt fumes continue to rise from the asphalt coated fiberglass mat in the short distance that it travels from the coating operating to the cooling operation. The asphalt fumes are emitted as fugitive VOC emissions that are eventually exhausted from the production building.

This source of VOC emissions from a roofing line are not addressed in AP-42 and published emission factors do not exist for these fugitive VOC emissions. A check with other roofing manufactures determined that one company has performed limited testing of these fugitive VOC emissions. Based on their work, they developed unofficial VOC emission factors that were given as a function of the finished production weight (lbs. Of VOC per ton of product produced).

These VOC emission factors range from 0.01 – 0.03 lbs. of VOC per ton of product. This range reflects the variation in the capture efficiency of the hood system associated with the coating operation.

5.8.1 EMISSION CALCULATIONS FOR THE FUGITIVE VOCs

Emission Calculation basis:

1) From the Material Balance, Section 7, Table 2, Item 3, Products & By-Products – Output Roofing Shingles = 134,827 lb/hr Maximum
2) Assume the higher emission rate of the above VOC emission range @ 0.03 lb/ton of product
3) 8,760 hours of operation per year maximum

Calculations:

VOC Emissions = (0.03 lb/ton of product) x (134,827 lb/hr) x (1 ton / 2,000 lb) = **2.02 lb/hr**
= (2.02 lb/hr) x (8,760 hr/yr) X (1 ton / 2,000 lb)
= **8.85 tpy**

[Revision 1 = this page added for fugitive VOC values.]

PERMIT NO. R – 7711A PERMIT TYPE: CONSTRUCTION [ ] AMENDMENT [ ] ALTERATION [ ] RENEWAL [X]

ACCOUNT ID NO. DB-0378-S

TABLE 1(a)
EMISSION SOURCES

PAGE 1 OF
DATE 08/29/200

Review of applications and issuance of permits will be expedited by supplying all necessary information requested on this Table.

AIR CONTAMINANT DATA					EMISSION POINT DISCHARGE PARAMETERS											
EMISSION POINT [1]		COMPONENT OR AIR CONTAMINANT NAME (2)	AIR CONTAMINANT EMISSION RATE		UTM COORDINATES OF EMISSION PT. [5]			SOURCE								
								HEIGHT ABOVE GROUND [ft.]	HEIGHT ABOVE STRUCT. [ft.] [6(A)]	STACK EXIT DATA			FUGITIVES			
NUMBER	NAME		#/HR [3]	TONS/ YR [4]	ZONE	EAST [meters]	NORTH [meters]			DIA. [ft.] [6(B)]	VEL. [fps] [6(C)]	TEMP. [°F] [6(D)]	LENGTH [ft.] [7(A)]	WIDTH [ft.] [7(B)]	AXIS DEG. [7(C)]	E/W NOR [7(D
EPN 25	Sand Application Baghouse	PM	5.46	23.9	14	700,000	3,628,600	58		3.82	65	100	N/A	N/A		
FIN 25																
EPN 26	Stabilizer Storage Baghouse A and B	PM	0.15	0.7	14	700,036	3,628,620	36		0.68	59	Amb.	N/A	N/A		
FIN 26																
EPN 27	Stabilizer Heater Baghouse	PM	0.09	0.4	14	700,036	3,628,610	116		1.47	35	200	N/A	N/A		
FIN 27																
EPN 28	Asphalt Heater	NO_X	0.59	2.6	14	700,038	3,628,630	30		2.82	30	570	N/A	N/A		
		SO_2	0.004	0.02												
FIN 28		PM	0.04	0.2												
		CO	0.50	2.2												
		VOC	0.03	0.1												
EPN 30	Oil Heater	NO_X	0.27	1.2	14	700,036	3,628,610	8		0.8	30	700	N/A	N/A		
		SO_2	0.002	0.01												
FIN 30		PM	0.02	0.1												
		CO	0.23	1.0												
		VOC	0.01	0.04												
EPN 34	ESP	VOC	2.30	11.0	14	700,036	3,628,610	35		3.11	53	125	N/A	N/A		
		PM	1.24	5.4												
EPN 8	Boiler and Thermal Oxidizer	NO_X	1.75	7.7	14	700,000	3,628,600	10		2.5	18	200	N/A	N/A		
		SO_2	0.73	3.2												
		PM	0.16	0.7												
		CO	1.28	5.6												
FIN 8		VOC	0.09	0.4												
EPN FUG1	Fugitive Fumes from Asphalt Coater	VOC	2.02	8.85	14	700,146	3,628,519	33	3.2	4.5	18	100	N/A	N/A		
FIN FUG1																
EPN																
FIN																
EPN																
FIN																
EPN																
FIN																
EPN																
FIN																
EPN																
FIN																

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SEP 27 2001
Air & Waste Applications Team

EPN = EMISSION POINT NUMBER
FIN = FACILITY IDENTIFICATION NUMBER

GROUND ELEVATION OF FACILITY ABOVE MEAN SEA LEVEL _____
TNRCC STANDARD CONDITIONS ARE 68°F AND 14.7 PSIA [GENERAL RULE 10

See instructions on reverse side.

General Instructions:

1. Identify each emission point with a unique number for this plant site and associate the EPN to the appropriate facility with a facility identification number (FIN). These numbers can be alphanumeric and must be consistent with emission point identification used on plot plan, previous permits, and Emissions Inventory Questionnaire. Limit emission point numbers to 10 character spaces. For each emission point, use as many lines as necessary to list air contaminant data. Typical emission point names are: heater, vent, boiler, tank, reactor, separator, baghouse, fugitive, etc. Typical EPN and/or FIN numbers are: BOILER1, 100B1, BH1, etc. FINs can be the same as EPNs if appropriate. Abbreviations are acceptable.

2. Typical component names are: air, H_2O, nitrogen, oxygen, CO_2, CO, NO_x, SO_2, hexane, particulate matter (PM), etc. Abbreviations are acceptable.

3. Pounds per hour (#/HR) is maximum short-term emission rate expected to occur in any one-hour period.

4. Tons per year (Tons/Yr) is annual total maximum emissions expected by applicant, taking the process operating schedule into account.

5. As a minimum, applicant must furnish a facility plot plan drawn to scale showing a plant benchmark, latitude and longitude correct to the nearest second for the benchmark, and all emission points dimensioned with respect to the benchmark as required by General Application, Form PI-1. This information is essential for calculation of emission point UTM coordinates. Please show emission point UTM coordinates if known. Use the southwest corner as the emission point coordinate for each area source.

6. A. Enter the stack's height above a supporting structure (i.e., building).

   B. For rectangular stacks, enter the length, width, and the equivalent circular diameter. Indicate horizontal discharge or covered stacks (raincap) with a note.

   C. Enter velocity in actual feet per second.

   D. Enter the actual temperature if the exit temperature is "room" or "climate controlled". Enter "ambient" to represent exit temperatures that are the same as the outdoor environment. Flare exit temperatures are not required.

7. A,B. For area fugitive sources, enter the dimensions of a rectangle which will "enclose" all fugitive sources included in this emission point number. Length to width ratio should be 10:1 or less. Subdivide larger areas to meet this requirement.

   C. Enter the number of degrees the long axis of the fugitve area is offset from north-south.

   D. Enter the direction the long axis is offset from north-south.

****
*** ACTIVITY REPORT ***
****

TRANSMISSION OK

TX/RX NO.	7154
CONNECTION TEL	912146375202
CONNECTION ID	
START TIME	11/06 08:39
USAGE TIME	04'37
PAGES	6
RESULT	OK

TNRCC

Protecting Texas by Reducing and Preventing Pollution

FAX TRANSMITTAL

DATE: 11/6/01 NUMBER OF PAGES *(including this cover sheet):* 6

TO:
Name: Mr. Caesar Hage
Organization: GAF Materials Corporation
FAX Number: 214-637-~~8919~~ 5202

FROM: TEXAS NATURAL RESOURCE CONSERVATION COMMISSION
Name: Ronica Romero
Division/Region: Air and Waste Applications Team
Telephone Number: 512-239-1588
FAX Number: 512 239-4500

Re: Name of Company GAF Materials Corporation Permit No. 7711A

Attached is a draft portion of the Notice of Receipt of Application and Intent to Obtain a Permit, which contains information relevant to your application. The application will not be declared administratively complete until you confirm that the notice text is acceptable. Please review the information carefully and provide us with your comments **within two business days.** Longer delays may result in your application being returned.

In some cases, the notice is required to be published in another language. Included is a simple check list to help you determine if a bilingual notice is [illegible]

TNRCC

Protecting Texas by Reducing and Preventing Pollution

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In some cases, the notice is required to be published in another language. Included is a simple check list to help you determine if a bilingual notice is necessary. Please indicate at this time if you will need this notice.

If you have questions about the notice text or determining your alternative language needs, please contact me at the number listed above.

Please complete the portion below and fax this page and the attached bilingual check list back to the above number. Again, we CANNOT proceed with processing your application until we have this information. Your assistance is appreciated.

Text of Notice Approved by: _____ Date: _____

Is alternative language required? Yes_____ No_____

Language(s):_____

TEXAS NATURAL RESOURCE CONSERVATION COMMISSION

EXAMPLE A

NOTICE OF RECEIPT OF APPLICATION AND INTENT TO OBTAIN AIR PERMIT

AIR QUALITY PERMIT NO. 7711A

APPLICATION GAF Materials Corporation, P.O. Box 655607, Dallas, Texas, 75265-5607, has applied to the Texas Natural Resource Conservation Commission (TNRCC) for an amendment to Air Quality Permit No. 7711A which would authorize modification to the Asphalt Roofing Materials Manufacturing Facility located at 2600 Singleton Boulevard, Dallas, Dallas County, Texas. The following air contaminants will be evaluated for authorization: nitrogen oxides, sulfur dioxide, carbon monoxide, particulate matter, and organic compounds.

This application was submitted to the TNRCC on July 31, 2001. The application is available for viewing and copying at the TNRCC central office, the TNRCC Dallas-Fort Worth regional office, and the Probate Court at Law No. 1, 500 Main Street, Dallas, Dallas County. The facility's compliance file, if any exists, is available for public review in the Dallas-Fort Worth regional office of the TNRCC.

The TNRCC executive director has determined the application is administratively complete and will conduct a technical review of the application.

PUBLIC COMMENT/PUBLIC MEETING You may submit public comments, a request for a public meeting, or request a contested case hearing to the Office of the Chief Clerk at the address below. The TNRCC will consider all public comments in developing a final decision on the application. **The deadline to submit public comments is 30 days after newspaper notice is published.** After the deadline for public comments, the executive director will prepare a response to all relevant and material or significant public comments.

The purpose of a public meeting is to provide the opportunity to submit comments or ask questions about the application. A public meeting about the application may be held if the executive director determines that there is a significant degree of public interest in the application or if requested by a local legislator. A public meeting is not a contested case hearing.

If only comments are received on the application, the response to comments, along with notice of the executive director's action on the application, will be mailed to everyone who submitted comments or is on the mailing list for this application.

If a hearing request is timely filed, the executive director will complete the technical review, issue a preliminary decision on the application, and a Notice of Application and Preliminary Decision will be published and mailed to those who are on the mailing list for this application. That notice will contain the final deadline for submitting public comments.

After the final deadline for public comments following any required Notice of Application and Preliminary Decision, the executive director will consider the comments and prepare a response to all relevant and material, or significant public comments. If comments are received, the response to comments, along with the executive director's decision on the application, will then be mailed to everyone who submitted public comments or is on a mailing list for this application.

OPPORTUNITY FOR A CONTESTED CASE HEARING You may request a contested case hearing. A contested case hearing is a legal proceeding similar to a civil trial in state district court. Unless a written request for a contested case hearing is filed within 30 days from this notice, the executive director may approve the application. **If no hearing request is received within this 30-day period, no further opportunity for hearing will be provided.** A contested case hearing will only be granted based on disputed issues of fact that are relevant and material to the Commission's decision on the application. Further, the Commission will only grant a hearing on those issues raised during the public comment period and not withdrawn.

A person who may be affected by emissions of air contaminants from the facility is entitled to request a hearing. If requesting a contested case hearing, you must submit the following: (1) your name (or for a group or association, an official representative), mailing address, daytime phone number, and fax number, if any; (2) applicant's name and permit number; (3) the statement "[I/we] request a contested case hearing;" (4) a specific description of how you would be adversely affected by the application and air emissions from the facility in a way not common to the general public; (5) the location and distance of your property relative to the facility; and (6) a description of how you use the property which may be impacted by the facility. If the request is made by a group or an association, the one or more members who have standing to request a hearing, and the interests which the group or association seeks to protect, must also be identified. You may also submit your proposed adjustments to the application/permit which would satisfy your concerns. Requests for a contested case hearing must be submitted in writing within 30 days following this notice to the Office of the Chief Clerk, at the address below.

If a hearing request is timely filed, additional notice may be provided. Following the close of all applicable comment and request periods, the executive director will forward the application and any requests for contested case hearing to the TNRCC Commissioners for their consideration at a scheduled Commission meeting. If a hearing is granted, the subject of a hearing will be limited to disputed issues of fact relating to relevant and material air quality concerns raised during the comment period. Issues such as property values, noise, traffic safety, and zoning are outside of the Commission's jurisdiction to address in this proceeding.

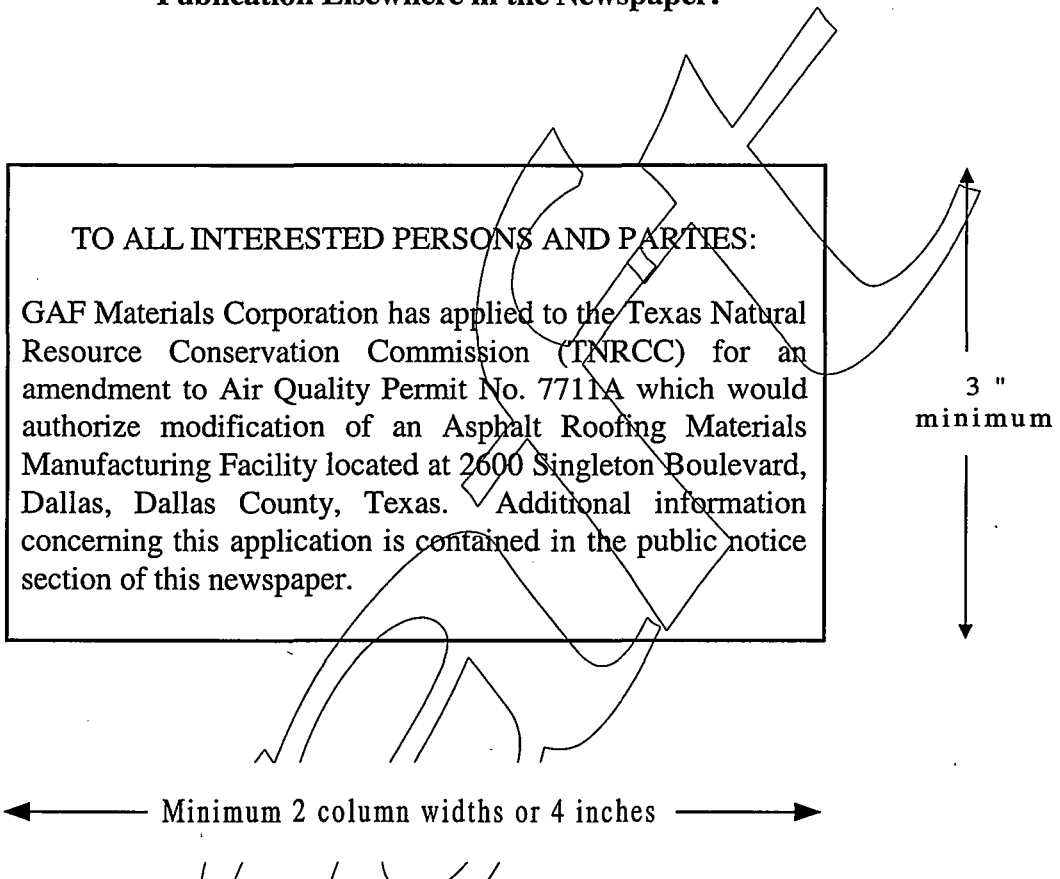
MAILING LIST In addition to submitting public comments, you may ask to be placed on a mailing list to receive future public notices for this specific application mailed by the Office of the Chief Clerk by sending a written request to the TNRCC Office of the Chief Clerk at the address below.

INFORMATION Written public comments or requests for a public meeting or contested case hearing should be submitted to the Office of the Chief Clerk, MC-105, TNRCC, P.O. Box 13087, Austin, Texas 78711-3087. For more information about this permit application or the permitting process, please call the Office of Public Assistance, Toll Free, at 1-800-687-4040. General information regarding the TNRCC can be found at www.tnrcc.state.tx.us.

Further information may also be obtained from GAF Materials Corporation at the address stated above or by calling Mr. Caesar Hage at (214) 637-8919.

EXAMPLE B

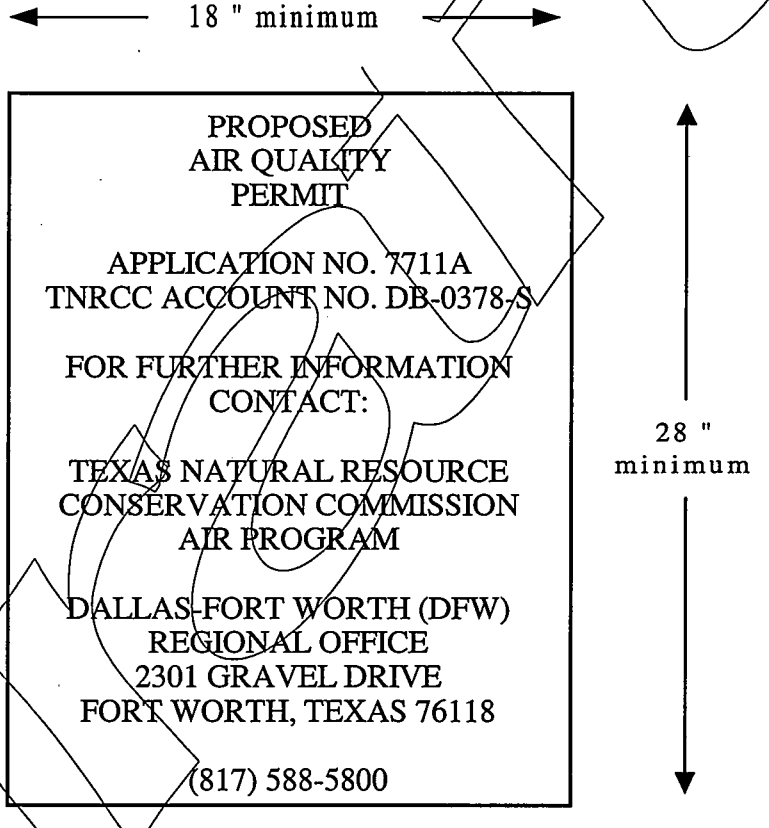
Publication Elsewhere in the Newspaper:



EXAMPLE C

SIGN POSTING

Sign(s) must be in place on day of publication of first newspaper notice and must remain in place and be legible for the 30-day public comment period (which begins on the last day of newspaper publication, either English or alternate language, whichever is later). Note - The information shown is an example only. It is your responsibility to verify that the appropriate information pertaining to your application is accurate. Each sign placed at the site must be located within 10 feet of each (every) property line paralleling a street or other public thoroughfare. Signs must be spaced at not more than 1,500-foot intervals. A minimum of one sign, but not more than three signs shall be required along any property line paralleling a public thoroughfare.



Sign(s) must be placed at whatever height above the ground is necessary for sign(s) to be 100 percent visible from the street.

WHITE BACKGROUND WITH BLACK LETTERS

All lettering must be 1½" block printed capitals

EASY STEPS TO DETERMINE IF YOU WILL REQUIRE A BILINGUAL PUBLIC NOTICE

Public notice rules require you to determine whether a bilingual language program is offered at the nearest elementary or middle school to the facility for which you seek a permit or an amendment. If it is, the bilingual notice will be triggered. If it is not, but children who would normally attend those schools are eligible to attend bilingual programs elsewhere in the school district, the bilingual notice will also be necessary.

Please call the school district with the names of the nearest elementary and middle schools and obtain the following information:

- Is a bilingual program required by the Texas Education Code in the School District?

  ❑ Yes
  ❑ No

- Are the children who attend either the elementary school or the middle school closest to your facility eligible to be enrolled in a bilingual program provided by the district?

  ❑ Yes
  ❑ No

- If yes, which language is required by the bilingual program?

  Name of Language: _____

Complete instructions on publishing the bilingual notice and posting signs will be available in your full public notice package. This is just to determine if the notice will be needed.

Please complete the above and fax this page back to us with the language approval page. Our fax number is (512) 239-4500. Thank You.

Air PA | acct #DB0378S / RN 100788959 7711A/PA

TEXAS NATURAL RESOURCE CONSERVATION COMMISSION

Protecting Texas by Reducing and Preventing Pollution

April 28, 2000

Mr. Randy Ford
Engineer
GAF Materials Corporation
P.O. Box 655607
Dallas, Texas 75265

Re: Permit No. 7711A
Expiration Date: 12/04/00
Asphalt Roofing Manufacturing Facility
Dallas, Dallas County
Account ID No. DB-0378-S

Dear Mr. Ford:

Section 382.055 of the Texas Clean Air Act, Texas Health and Safety Code, Chapter 382, and 30 Texas Administrative Code Chapter 116, Section 116.311(a) (copy enclosed), require all permits issued by the Texas Natural Resource Conservation Commission to be reviewed for renewal every 15 years. This letter is to notify you that the referenced permit is scheduled for review. Please apply for review of your permit no later than 90 days prior to the referenced expiration date using the enclosed application form. Failure to apply will result in automatic expiration of this permit on the 15th anniversary of its issuance.

Please furnish all information indicated on the enclosed form. A fee based on the schedule indicated in §116.313 must be submitted with this application. Upon receipt of your application, a determination will be made based on the number and type of emission points, emission rate and type of air contaminant, as to the need for you to furnish atmospheric dispersion modeling to determine the impact of emissions on the surrounding area. After receipt of a completed application, you will be notified of the requirements and procedures for public notification.

If we may be of assistance to you in this matter, please contact Mr. Don Duke at (512) 239-1314.

Sincerely,

John F. Steib, Jr.
Director
Air Permits Division

JS/DD/ag

Enclosures

cc: Mr. Jesse Macias, Air Program Manager, Arlington
Mr. Scott Hill, Air Pollution Control Program, Department of Health and Human Services, Dallas

7711A

SENDER:

- ☐ Complete items 1 and/or 2 for additional services. Complete items 3, 4a, and 4b.
- ☐ Print your name and address on the reverse of this form so that we can return this card to you.
- ☐ Attach this form to the front of the mailpiece, or on the back if space does not permit.
- ☐ Write *"Return Receipt Requested"* on the mailpiece below the article number.
- ☐ The Return Receipt will show to whom the article was delivered and the date delivered.

I also wish to receive the following services (for an extra fee):

1. ☐ Addressee's Address
2. ☐ Restricted Delivery

3. Article Addressed to:

Mr. Randy Ford
Engineer
GAF Materials Corporation
P.O. Box 655607
Dallas, Texas 75265

4a. Article Number
P092 831 407

4b. Service Type
- ☐ Registered
- ☑ Certified
- ☐ Express Mail
- ☐ Insured
- ☐ Return Receipt for Merchandise
- ☐ COD

7. Date of Delivery
5-15-00 MAY 15 2000

5. Received By: *(Print Name)*
STEVE ARMSTRONG

6. Signature *(Addressee or Agent)*
Steve Armstrong

8. Addressee's Address *(Only if requested and fee is paid)*

Is your RETURN ADDRESS completed on the reverse side?

Thank you for using Return Receipt Service.

PS Form **3811**, December 1994 102595-99-B-0223 Domestic Return Receipt

4-28-00